

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LISHAY LAVI, AYELET SAMERANO,  
NOACH NEWMAN, ADIN GESS, MAYA  
PARIZER, NATALIE SANANDAJI, YONI  
DILLER, HAGAR ALMOG, DAVID  
BROMBERG, LIOR BAR OR, and ARIEL EIN-  
GAL,

## JURY TRIAL DEMANDED

Civil Action Case No. 24-312-RGA

*Plaintiffs,*

V.

UNITED NATIONS WORKS AND RELIEF )  
ADMINISTRATION (“UNRWA”) and )  
UNRWA USA NATIONAL COMMITTEE, INC. )  
 (“UNRWA USA”), )

*Defendants.*

**AMENDED COMPLAINT FOR DAMAGES AND JURY DEMAND**

COME NOW Plaintiffs Lishay Lavi, Ayelet Samerano, Noach Newman, Adin Gess, Maya Parizer, Natalie Sanandaji, Yoni Diller, Hagar Almog, David Bromberg, Lior Bar Or, and Ariel Ein-Gal (“Plaintiffs”), by and through their attorneys at the National Jewish Advocacy Center, Inc. (“NJAC”) and supporting counsel, for their Amended Complaint,<sup>1</sup> allege the following against United Nations Works and Relief Administration (“UNRWA”) and UNRWA USA National Committee Inc. (“UNRWA USA”) (collectively, “Defendants”):

## NATURE OF THE ACTION

1. The massacre committed by Harakat al-Muqawama al-Islamiya, known by its shortened name “*Hamas*,” on October 7 (“October 7 Terror Attacks”) is one of the most

<sup>1</sup> A copy of a redline showing the changes to the original complaint is attached hereto as Exhibit 1.

documented massacres in history: Hamas terrorists reveled as they filmed their own abject cruelty. The purpose of this lawsuit is to hold accountable both those who committed unspeakable barbarism—including employees of UNRWA—and those who funded it—UNRWA USA—and to ensure that no Delaware corporation is involved in such a scheme again.

2. On October 7, 2023, the U.S.-designated Foreign Terrorist Organization (“FTO”) Hamas launched a surprise attack on the innocent civilians of southern Israel. This attack resulted in the murder of over 1,200 Israelis and over 6,900 injured civilians. During this attack, Hamas terrorists brutally beat, tortured, raped, murdered, and took hostages. But Hamas did not carry out these attacks alone. Not only were they accompanied by members of other FTOs operating in Gaza, but they were heavily assisted both on October 7, 2023, and for years prior by Defendant United Nations Relief and Works Agency for Palestine Refugees in the Near East (“UNRWA”) and Defendant UNRWA USA National Committee, Inc. (“UNRWA USA”).

3. Defendant UNRWA was established by the United Nations General Assembly in December of 1949 as an agency to provide relief and assistance to Palestinian populations within the Middle East. But UNRWA has strayed far from this mandate, insofar as it has corrupted its own operations over a matter of decades in order to enrich and empower itself and its employees at the expense of those Palestinian populations. UNRWA, with the assistance of Defendant UNRWA USA, willingly and knowingly provided the funding, logistical infrastructure, and human support staff needed to build Hamas into one of the most horrific and dreaded terrorist organizations in world history.

4. UNRWA did not accidentally find itself providing incidental (much less accidental) support to a terrorist organization. Rather, it very systematically and cynically incorporated the Hamas terrorist entity into every aspect of UNRWA’s operations. The two became functionally

indistinguishable in terms of their control and influence over Palestinian life, the flow of funds in and out of the Palestinian territories, and most importantly and most incriminating, UNRWA's active support and the participation by at least eighteen UNRWA employees in the October 7 Terror Attacks.

5. A common refrain in the last several years has been " Hamas is UNRWA and UNRWA is Hamas." This is not just a rhetorical device—it is an observation of fact. Indeed, UNRWA facilitated Hamas's ascent by welcoming Hamas officials into its schools and classrooms. UNRWA has since worked hand-in-hand with Hamas and other local terrorist organizations in Gaza, even hiring a multitude of terrorists to fill senior roles in UNRWA schools, thereby giving Hamas access to young recruits and desirable infrastructure beneath which and within which to hide their weapons and other equipment. Hamas also controls the UNRWA Gaza staff union and provides "background checks" to UNRWA for each UNRWA employee, presumably maintaining veto power over the potential employment of individuals at UNRWA. Finally, UNRWA's Gaza payment system in U.S. dollars ensures that Hamas moneychangers receive a sizeable cut of every UNRWA employee's paycheck. Given UNRWA is one of the largest employers in Gaza, this "cut," in the aggregate, amounts to millions of dollars. UNRWA is not just aware of this entire arrangement, but an active participant in what could only be described as a partnership with Hamas.

6. Operating as a 501(c)(3) nonprofit organization in the United States, Defendant UNRWA USA has the stated mission of "supporting the humanitarian work of Defendant UNRWA through fundraising, advocacy, and community engagement in the United States." UNRWA USA has been and is fully aware of UNRWA's partnership with Hamas, described at length prior. UNRWA USA knowingly aids, abets, and provides material support for those

activities under the guise of providing grants to UNRWA. Defendant UNRWA USA collects donations in the United States and then transfers nearly all its funds to Defendant UNRWA, which then works hand-in-hand with FTOs in Gaza, most notably Hamas.

7. Once UNRWA USA funds reach the Gaza Strip, UNRWA knowingly redistributes those funds (1) to the hundreds of terrorists on the UNRWA payroll, some of whom are directly engaged in acts of terrorism, including but not limited to, the October 7 Terror Attacks; (2) to schools that are used to store Hamas's weapons and other equipment; (3) to the production of violently antisemitic educational materials that promote the destruction of the state of Israel and are designed to recruit young Gazans to Hamas; and (4) to the elaborate money laundering scheme that allows Hamas to barter in U.S. dollars. UNRWA USA raises and transfers such funds knowingly, willfully, and with the intention that the funds be used by an FTO and its members for terrorist purposes. Indeed, both UNRWA and UNRWA USA knowingly, willfully, and intentionally work directly and indirectly in confederation and agreement with Hamas and other FTOs to provide material support to them for their terrorist activities.

8. In result of the activities of Defendants UNRWA and UNRWA USA, this is an action brought by Plaintiffs Noach Newman, Adin Gess, Maya Parizer, Natalie Sanandaji, Yoni Diller, David Bromberg, and Lior Bar Or (collectively, "**U.S. Plaintiffs**"), victims of Hamas's terror attacks on October 7, 2023 ("October 7 Terror Attacks"), against Defendants UNRWA and UNRWA USA for damages pursuant to the Antiterrorism Act, 18 U.S.C. § 2333 ("ATA"), as amended by the Justice Against Sponsors of Terrorism Act ("JASTA"), Pub. L. No. 114-222 (2016), for aiding, abetting, and knowingly providing material support and resources to Hamas and other designated Foreign Terrorist Organizations ("FTOs") and conspiring to provide them material support in their commission of the October 7 Terror Attacks.

9. This is also an action brought by Plaintiffs Lishay Lavi, Ayelet Samerano, Hagar Almog, and Ariel Ein-Gal (collectively, “**Israeli Plaintiffs**”) against Defendant UNRWA USA for damages pursuant to Alien Tort Statute (ATS), 28 USCS § 1350 for the injuries they suffered and continue to suffer as a result of the October 7 Terror Attacks. More specifically, Ms. Lavi’s husband is still being held hostage by Hamas, which continues to receive funds from Defendants to this day.

10. For all Plaintiffs, the harms suffered from the October 7 Terror Attacks are ongoing.

11. The civil liability provision of the ATA “establish[ed] a civil counterpart” to existing criminal penalties for international terrorism. *See* 137 Cong. Rec. S8143 (daily ed. Apr. 16, 1991) (statement of Sen. Grassley) (“The ATA removes the jurisdictional hurdles in the courts confronting victims and it empowers victims with all the weapons available in civil litigation.”)

12. The purpose of JASTA is “to provide civil litigants with the broadest possible basis, consistent with the Constitution of the United States, to seek relief against persons, entities, and foreign countries, wherever acting and wherever they may be found, that have provided material support, directly or indirectly, to foreign organizations or persons that engage in terrorist activities against the United States.”

### **JURISDICTION AND VENUE**

13. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1350, as well as pursuant to 18 U.S.C. §§ 2333(a) and 2334.

14. This Court has personal jurisdiction over Defendant UNRWA USA, insofar as Defendant UNRWA USA is incorporated in the State of Delaware.

15. This Court has personal jurisdiction over Defendant UNRWA, insofar as Defendant UNRWA’s largest private donor in the United States and with whom it has regular contact is

Defendant UNRWA USA. Defendant UNRWA USA and UNRWA have an ongoing, systematic financial relationship. Last year, UNRWA accepted \$22 million from Delaware-corporation UNRWA USA. By purposefully directing fundraising activities into Delaware through UNRWA USA, UNRWA avails itself of Delaware's corporate law protections, thereby establishing the requisite minimum contacts necessary for this Court's exercise of jurisdiction. Furthermore, Defendants UNRWA and UNRWA USA conspired to raise and transfer funds that materially supported terrorism, rendering jurisdiction proper under Delaware's conspiracy theory of jurisdiction.

16. While certain organs of the United Nations ("U.N.") enjoy immunity under the Convention of the Privileges and Immunities of the United Nations, some UN-affiliated bodies, such as UNRWA, do not unless they "have been designated by the President through an appropriate Executive order as being entitled to enjoy the privileges, exemptions, and immunities provided in the" International Organization Immunities Act of 1945 ("IOIA"). *See* Exhibit A. No such executive designation with respect to UNRWA under the IOIA has been made. Therefore, UNRWA does not enjoy immunity from suit in the present action.

17. Though based in Amman, Jordan, and in Gaza, UNRWA engages in a number of activities in the United States, as senior personnel from UNRWA frequently travel to solicit funds and receive approval for their budget operations here in the United States. UNRWA also has New-York based staff that facilitate UNRWA's work in the Middle East. UNRWA also initially disburses its payroll through the bank J.P. Morgan Chase in New York.

18. Venue in this district is proper under 28 U.S.C. §§ 1391(b) and (d), as Defendant UNRWA USA is incorporated in the State of Delaware, and a substantial part of the events at issue concern the regular transfer of funds from Defendant UNRWA USA, a Delaware corporation, to

Defendant UNRWA.

### **PARTIES**

19. Plaintiff Lishay Lavi is an Israeli citizen. Her husband, Omri Miran, was kidnapped by Hamas terrorists on October 7, 2023, after the terrorists broke into her home in Kibbutz Nachal Oz in southern Israel. Ms. Lavi's husband remains a Hamas hostage to this day. As a result, Ms. Lavi and her family have suffered and continue to suffer unbearable trauma, severe mental anguish, extreme emotional pain and suffering, and loss of consortium.

20. Plaintiff Ayelet Samerano is an Israeli citizen. Her son Yonatan Samerano, also an Israeli citizen, attended the October 7 Nova Festival. When Hamas terrorists descended on the festival, he and two friends fled to Kibbutz Be'eri seeking safety, unaware that Hamas terrorists had invaded and attacked the kibbutz. All three friends were shot dead at the gates of the kibbutz. Terrorists, including an UNRWA employee, returned to the gate and kidnapped her son Mr. Samerano's body, taking it back into Gaza with them. Video footage shows UNRWA social worker Faisal Ali Mussalem al-Naami throwing Mr. Samerano's body into the back of an SUV.

21. Plaintiff Noach Newman has dual citizenship in the United States and Israel. On October 7, 2023, Mr. Newman's brother, David Yair Shalom Newman, also a dual citizen of the United States and Israel, attended the October 7 Nova Festival and was brutally murdered by Hamas terrorists. As a result, Mr. Newman and his family have suffered and continue to suffer severe mental anguish and extreme emotional pain and suffering.

22. Plaintiff Yoni Diller has dual citizenship in the United States and Israel. On October 7, 2023, Mr. Diller was in attendance at the October 7 Nova Festival when Hamas slaughtered hundreds of innocent festival attendees. Amidst the terrorist ambush, Mr. Diller sought refuge as he witnessed the massacre of festival attendees around him. Among the murdered attendees were

four of Mr. Diller's close friends. As a result of this terrorist attack, Mr. Diller has suffered severe mental anguish and extreme emotional pain and suffering.

23. Plaintiff Adin Gess is a United States citizen who lived with his family in Kibbutz Holit before and at the time of the October 7 Hamas terrorist attacks. Mr. Gess fortunately was not home during the attacks, but he witnessed the massacre on the communal WhatsApp group where he saw his friends and community pleading for help before they were brutally murdered. Mr. Gess was subsequently evacuated from his home. He has still not been able to return. As a result of the October 7 Hamas terrorist attacks, Mr. Gess has lost his home, his belongings, his community, and his way of life. In turn, Mr. Gess has suffered severe mental anguish and extreme emotional pain, and suffering.

24. Plaintiff Natalie Sanandaji is a United States citizen who resides in New York. Ms. Sanandaji was visiting Israel and in attendance at the October 7 Nova Festival with Israeli friends. When the Hamas terrorist attacks began, Ms. Sanandaji fled by car and then on foot for several hours, witnessing the atrocities first-hand and running through Hamas gunfire. Ms. Sanandaji ran on foot for over four hours before she reached safety. As a result of the October 7 Hamas terrorist attacks, Ms. Sanandaji has suffered severe mental anguish and extreme emotional pain and suffering.

25. Plaintiff Maya Parizer has dual citizenship in the United States and Israel. She attended the October 7 Nova Festival as part of her birthday celebration with her boyfriend and other friends. When the Hamas attacks began, Ms. Parizer fled by car with her boyfriend, while they dodged Hamas gunfire and passed dead bodies on the roads. As a result of the October 7 Hamas terrorist attacks, Parizer has suffered severe mental anguish and extreme emotional pain and suffering.



26. Plaintiff Hagar Almog is an Israeli citizen who lived with her family in Kibbutz Holit before and during the October 7 Hamas terrorist attacks. Ms. Almog was fortunately not home when Hamas attacked Kibbutz Holit, but she witnessed the massacre on the communal WhatsApp group and saw her friends and community pleading for help before they were brutally murdered. Ms. Almog subsequently was evacuated from her home and still has not been able to return. As a result of the October 7 Hamas terrorist attacks, Ms. Almog has lost her home, her belongings, her community, and her way of life. She has suffered severe mental anguish and extreme emotional pain and suffering.

27. Plaintiff David Bromberg is a United States and Israeli dual citizen. He attended the October 7 Nova Festival. When the Hamas terrorist attacks began, Mr. Bromberg ran for his life until he found shelter hiding in the bushes outside of Kibbutz Be'eri, one of the many kibbutzim that Hamas ravaged. After enduring twelve hours of fear and trauma, Mr. Bromberg and others were rescued. Mr. Bromberg lost multiple friends in the Hamas attacks, and one of his friends is a Hamas hostage to this day. As a result of the October 7 Hamas terrorist attacks, Mr. Bromberg has endured severe mental anguish and extreme emotional pain and suffering.

28. Plaintiff Lior Bar Or has dual citizenship in the United States and Israel. He attended the October 7 Nova Festival with five friends. As Hamas began their pogrom, he sought protection in a shelter with other defenseless festival attendees. Mr. Bar Or and other attendees were attacked with automatic gunfire and hand-grenades, as Hamas terrorists set the shelter on fire with Bar Or and others inside. Mr. Bar Or managed to escape, but four of his friends were murdered by Hamas terrorists. As a result, Plaintiff Bar Or has suffered and continues to suffer severe mental anguish and extreme emotional pain and suffering.

29. Plaintiff Ariel Ein-Gal is an Israeli citizen. On October 7, 2023, Mr. Ein-Gal and

his friends were asleep on Zikim Beach. They awoke to swarms of terrorists infiltrating the coast by boats. Mr. Ein-Gal fled from Hamas terrorists while under heavy gunfire and managed to get to a shelter, where he hid for four hours. When he tried to escape with a car, he was ambushed by four terrorists, who shot dozens of rounds into his vehicle from close range. Mr. Ein-Gal survived, but as a result the October 7 Hamas terrorist attacks, he has suffered severe mental anguish, trauma, and extreme emotional pain and suffering.

30. Defendant UNRWA is an international organization whose nominal purpose is to advocate for the needs of Palestinians in Gaza, the West Bank, Lebanon, Jordan, and Syria. It is affiliated with the United Nations, but unlike the United Nations, it does not enjoy diplomatic immunity and therefore may be sued in this Court. *See* Exhibit A.

31. Defendant UNRWA USA is an independent 501(c)(3) nonprofit organization registered in the State of Delaware. It was formed in 2005. Its stated mission is to “support[] the humanitarian work of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) through fundraising, advocacy, and community engagement in the United States.”<sup>2</sup>

## **FACTS**

### ***A. Hamas Terrorists Brutally Attacked Israel on October 7, 2023.***

32. On October 7, 2023, the Gaza-based terrorist organization Hamas led a terrorist attack in southern Israel that killed over 1,200 Israelis and took over 200 hostages.<sup>3</sup> Hamas tortured and butchered innocent men, women, and children—including U.S. citizens—at a music festival, as well as in their homes across southern Israel. The attack included a barrage of over 2,200

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<sup>2</sup> *unrwa + palestine refugees*, UNRWA USA, <https://www.unrwausa.org/unrwa-palestine-refugees> (last visited Mar. 5, 2024).

<sup>3</sup> *Israel-Hamas War Israel Lowers Oct. 7 Death Toll Estimate to 1,200*, N.Y. TIMES (updated Nov. 30, 2023), <https://www.nytimes.com/live/2023/11/10/world/israel-hamas-war-gaza-news>.

missiles shot from Gaza into Israel.<sup>4</sup> Over 6,900 people were injured in the attacks.<sup>5</sup>

33. During these attacks, Hamas terrorists raped, mutilated, and brutally beat women.<sup>6</sup> According to the Association of Rape Crisis Centers in Israel (ACCRI), “rape was conducted in front of an audience, such as partners, family, or friends, to increase the pain and humiliation for all present.”<sup>7</sup> Independent news organizations, like *The New York Times* and *BBC*, have verified, through tapes and first-hand accounts, that Hamas committed these heinous acts of sexual violence.<sup>8</sup>

34. According to a report released on March 4, 2023, by the UN Special Representative on Sexual Violence in Conflict, “[T]here are reasonable grounds to believe that conflict-related sexual violence occurred during the 7 October attacks in multiple locations across the Gaza periphery, including rape and gang rape, in at least three locations.”<sup>9</sup> The UN team investigating Hamas’s actions reported “that several fully naked or partially naked bodies from the waist down were recovered—mostly women—with hands tied and shot multiple times, often in the head.”<sup>10</sup> In addition, “[t]here are further accounts of individuals who witnessed at least two incidents of rape of corpses of women.”<sup>11</sup>

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<sup>4</sup>Bill Hutchinson, *Israel-Hamas War: Timeline and key developments*, ABC NEWS (Nov. 22, 2023), <https://abcnews.go.com/International/timeline-surprise-rocket-attack-hamas-israel/story?id=103816006>.

<sup>5</sup>*Id.*

<sup>6</sup>Jeffrey Gettleman, ‘Screams Without Words’: How Hamas Weaponized Sexual Violence on Oct. 7, N.Y. TIMES (updated Jan. 25, 2024), <https://www.nytimes.com/2023/12/28/world/middleeast/oct-7-attacks-hamas-israel-sexual-violence.html#:~:text='Screams%20Without%20Words'%3A%20How,%2C%20center%2C%20and%20her%20sisters>.

<sup>7</sup>David Gritten, *Israeli report says Hamas sexual violence 'systematic and intentional'*, BBC NEWS (updated Feb. 21, 2024), <https://www.bbc.com/news/world-middle-east-68365284>.

<sup>8</sup>*Id.*

<sup>9</sup>U.N. OFFICE OF THE SPECIAL REPRESENTATIVE OF THE SECRETARY-GENERAL ON SEXUAL VIOLENCE IN CONFLICT, *Mission Report: Official Visit of the Office of the SRSG-SVC to Israel and the Occupied West Bank, 29 January – 14 February 2024*, ¶ 12 (Mar. 4, 2024), available at [https://news.un.org/en/sites/news.un.org/en/files/atoms/files/Mission\\_report\\_of\\_SRSG\\_SVC\\_to\\_Israel-oWB\\_29Jan\\_14\\_feb\\_2024.pdf](https://news.un.org/en/sites/news.un.org/en/files/atoms/files/Mission_report_of_SRSG_SVC_to_Israel-oWB_29Jan_14_feb_2024.pdf).

<sup>10</sup>*Id.*

<sup>11</sup>*Id.*

35. The report continues, “Based on the first-hand accounts of released hostages, the mission team received clear and convincing information that sexual violence, including rape, sexualized torture, and cruel, inhuman and degrading treatment occurred against some women and children during their time in captivity and has reasonable grounds to believe that this violence may be ongoing.”<sup>12</sup>

36. Videos from October 7, 2023, also show Hamas terrorists, including UNRWA employees, dragging dead bodies and innocent hostages into cars and celebrating and parading Israeli bodies around Gazan cities.<sup>13</sup>

37. When the attacks finally concluded, October 7, 2023, marked the deadliest day for the Jewish people since the Holocaust.<sup>14</sup>

***B. The Plaintiffs Were Victims of Hamas Terrorists on October 7, 2023.***

38. The Plaintiffs were among the victims that suffered at the hands of Hamas terrorists on October 7, 2023.

39. Plaintiff Ms. Lavi and her family watched Ms. Lavi’s husband, Omri Miran, and father get kidnapped by terrorists during the October 7 Hamas terrorist attacks. The whereabouts and status of Ms. Lavi’s husband, Mr. Miran, are still unknown to this day. Mr. Miran has been held hostage for over 600 days by Hamas.

40. Plaintiff Ayelet Samerano lost her son Yonatan when Hamas terrorists invaded Kibbutz Be’eri and committed unspeakable acts of cruelty and barbarism. One UNRWA employee

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<sup>12</sup> *Id.* at ¶ 71.

<sup>13</sup> Paul P. Murphy, Allegra Goodwin, Benjamin Brown, and Sharif Paget, *Desert horror: Music festival goers heard rockets, then Gaza militants fired on them and took hostages*, CNN (updated Oct. 9, 2023), <https://www.cnn.com/2023/10/07/middleeast/israel-gaza-fighting-hamas-attack-music-festival-intl-hnk/index.html>.

<sup>14</sup> Press Release, The White House, Remarks by President Biden on the October 7th Terrorist Attacks and the Resilience of the State of Israel and its People (Oct. 18, 2023), <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/10/18/remarks-by-president-biden-on-the-october-7th-terrorist-attacks-and-the-resilience-of-the-state-of-israel-and-its-people-tel-aviv-israel/>.

kidnapped Yonatan's body from the gate of Kibbutz Be'eri and brought it back into Gaza so that Ms. Samerano would not be able to properly bury and mourn her son. Yonatan's body was recovered by the Israeli Defense Forces and returned home to Israel in June 2025.

41. Plaintiff Mr. Newman lost his brother David when the Hamas terrorists breached the October 7 Nova Festival and savagely slaughtered David.

42. Plaintiffs Mr. Gess and Ms. Almog, who lived in Kibbutz Holit at the time of the October 7 Hamas terrorist attacks, witnessed the massacre of their friends and family via the communal WhatsApp group. They then were evacuated from their homes and have not returned. They have lost their homes, belongings, community, and way of life.

43. Plaintiffs Ms. Parizer and Ms. Sanandaji were in attendance at the October 7 Nova Festival when Hamas launched its attacks. They witnessed the massacre of hundreds of festival attendees before they wandered for hours by car and on foot as they sought refuge from Hamas terrorists.

44. Plaintiffs Mr. Diller and Mr. Bar Or also were in attendance at the October 7 Nova Festival when Hamas launched its attacks. They sought refuge as they witnessed the slaughter of festival attendees around them. Many of their friends were murdered by Hamas.

45. Plaintiff Mr. Bromberg also attended the October 7 Nova Festival. When Hamas launched its attacks, Bromberg witnessed the slaughter of hundreds of innocent people. Many of his friends were among the murdered attendees. One of his friends remains a hostage of Hamas to this day.

***C. Hamas Is a Foreign Terrorist Organization.***

46. The U.S. Department of State designated Hamas a Foreign Terrorist Organization

(“FTO”) in October 1997.<sup>15</sup> This designation remains current. Similarly, a host of international entities and countries also have designated Hamas a terrorist organization, including the European Union, Canada, and the United Kingdom.<sup>16</sup>

47. Hamas was founded in 1987 in Gaza by a Palestinian cleric who was an activist in local Muslim Brotherhood circles.<sup>17</sup> In 1988, Hamas published a charter “calling for the destruction of Israel and the establishment of an Islamic society in historic Palestine.”<sup>18</sup> Since its inception, the group “has vowed to annihilate Israel and has been responsible for many suicide bombings and other deadly attacks on civilians and Israeli soldiers.”<sup>19</sup> Article 7 of Hamas’s charter also calls for the extermination of world Jewry.<sup>20</sup>

48. In 2006, Hamas won parliamentary elections in Gaza and then seized control of the Gaza Strip from the internationally recognized Palestinian Authority in the following year.<sup>21</sup> Since 2007, Hamas has ruled over the Gaza Strip, while the Palestinian Authority has retained governing power over Area A and parts of Area B of the West Bank.<sup>22</sup>

49. For decades, Hamas has led attacks on Israel, including firing thousands of rockets into Israel. Due to Hamas hostility, armed conflict between Israel and Hamas has been common

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<sup>15</sup> *Designated Foreign Terrorist Organizations*, U.S. DEP’T OF STATE, BUREAU OF COUNTERTERRORISM, <https://www.state.gov/foreign-terrorist-organizations/> (last visited Mar. 5, 2024).

<sup>16</sup> *Responsible Reporting: Labeling Hamas as a Terrorist Organization*, ANTI-DEFAMATION LEAGUE, <https://www.adl.org/resources/blog/responsible-reporting-labeling-hamas-terrorist-organization> (last visited Mar. 5, 2024).

<sup>17</sup> Kali Robinson, *What Is Hamas?*, COUNCIL ON FOREIGN RELATIONS (updated Oct. 31, 2023), <https://www.cfr.org/backgrounder/what-hamas>.

<sup>18</sup> *What is Hamas? What to know about its origins, leaders and funding*, PBS.ORG (updated Oct. 13, 2023), <https://www.pbs.org/newshour/world/what-is-hamas-what-to-know-about-its-origins-leaders-and-funding>.

<sup>19</sup> Sarah El Deeb, *What is Hamas? The group that rules the Gaza Strip has fought several rounds of war with Israel*, ASSOCIATED PRESS (updated Oct. 15, 2023), <https://apnews.com/article/hamas-gaza-palestinian-authority-israel-war-ed7018dba09b81513daf3bda38109a>.

<sup>20</sup> Hamas, *Covenant of the Islamic Resistance Movement* art. 7 (1988).

<sup>21</sup> El Deeb, *supra* note 18.

<sup>22</sup> Simon Plosker, *Do You Know Your Area A, B and C?* HONEST REPORTING (May 20, 2019), <https://honestreporting.com/area-a-b-c-west-bank-palestinian-territories/>.

over the past two decades.<sup>23</sup>

50. On October 7, 2023, Hamas was joined in its attack on Israel by other U.S.-designated FTOs, including, but not limited to, Palestine Liberation Front (“PLF”), Palestine Islamic Jihad (“PIJ”), Popular Front for the Liberation of Palestine (“PFLP”), and PFLP-General Command (“PFLP-GC”).

***D. UNRWA and Defendant UNRWA USA Are Inextricably Linked in Their Support for Hamas.***

51. During this time, Hamas has worked hand-in-hand with UNRWA to provide Hamas members with employment, to educate future Hamas members, and to finance terrorism activities.

52. UNRWA was established by the United Nations General Assembly Resolution 302 (IV) of December 8, 1949 “to carry out [...] direct relief and works programmes” for “Palestine refugees.”<sup>24</sup> The Agency commenced operations on May 1, 1950.<sup>25</sup> All of the world’s other refugees from any and every country fall under the auspices of the United Nations High Commissioner for Refugees (UNHCR).

53. In that vein, UNRWA’s website states, “Unlike [The United Nations High Commissioner for Refugees], UNRWA does not have a mandate to resettle Palestine refugees and has no authority to seek lasting durable solutions for refugees. UNRWA is mandated by the UN

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<sup>23</sup> *Timeline: Key Events In The Israel-Arab And Israeli-Palestinian Conflict*, AMERICAN JEWISH COMMITTEE (updated 2023), <https://www.ajc.org/IsraelConflictTimeline>.

<sup>24</sup> The Palestinian refugee population has grown from approximately 750,000 to over 5,000,000, unlike any other refugee population in the world, due to the flexible definition of “refugee” that the United Nations has assigned specifically to the descendants of the 1948 Palestinian Arabs that fled their homes after Palestinian Arab leadership rejected the UN Partition Resolution and began launching attacks on Jewish groups. *See The Arab-Israeli War of 1948*, U.S. DEP’T OF STATE, <https://2001-2009.state.gov/r/pa/ho/time/cwr/97178.htm#:~:text=The%20Palestinian%20Arabs%20refused%20to,Jewish%20territory%20under%20the%20partition> (last visited Mar. 5, 2024). “These numbers include more than 2 million ‘refugees’ who hold Jordanian citizenship. They also include a larger number of ‘refugees’ who live in the West Bank and Gaza strip: They are citizens of the ‘Palestinian Authority’ or ‘State of Palestine’ and at the same time claim to be ‘refugees from Palestine.’” *Is UNRWA’s hereditary refugee status for Palestinians unique?*, Kohelet Policy Forum (Jan. 1, 2019), <https://en.kohelet.org.il/wp-content/uploads/2019/01/Background-paper-Is-UNRWAs-hereditary-refugee-status-for-Palestinians-unique.pdf>.

<sup>25</sup> *Frequently Asked Questions*, UNRWA, <https://www.unrwa.org/who-we-are/frequently-asked-questions> (last visited Mar. 5, 2024).

General Assembly to provide services to Palestine refugees ... pending a just and lasting solution to their plight.”<sup>26</sup>

54. UNRWA “is funded almost entirely by voluntary contributions.”<sup>27</sup>

55. The primary fundraising arm for UNRWA in the United States is Defendant UNRWA USA, a 501(c)(3) nonprofit organization incorporated in Delaware. Defendant’s stated mission is to “support[] the humanitarian work of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) through fundraising, advocacy, and community engagement in the United States.”<sup>28</sup>

56. While UNRWA USA claims to be “independent of the United Nations Relief and Works Agency (UNRWA) and [to] operate[] in accordance with U.S. law,”<sup>29</sup> UNRWA USA exists exclusively to promote UNRWA’s activities and fundraise for UNRWA. Indeed, UNRWA USA and UNRWA boast the same logo, font, and font color on their respective websites creating the perception that the two organizations are one-in-the-same. To that point, the “USA National Committee” language appears much smaller beneath the term “UNRWA” on UNRWA USA’s website.

57. UNRWA USA gives grants solely to UNRWA. In 2023, UNRWA USA delivered over \$22 million in grants to UNRWA.<sup>30</sup> In 2022, UNRWA USA disbursed over \$3.8 million in grants to UNRWA.<sup>31</sup> In 2021, the amount neared \$5 million.<sup>32</sup>

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<sup>26</sup> *Id.*

<sup>27</sup> *Who We Are*, UNRWA, <https://www.unrwa.org/who-we-are> (last visited Mar. 5, 2024).

<sup>28</sup> *unrwa + palestine refugees*, UNRWA USA, <https://www.unrwausa.org/unrwa-palestine-refugees> (last visited Mar. 5, 2023).

<sup>29</sup> Press Release, UNRWA USA, UNRWA USA Horrified by Allegations Against Some UNRWA Staff, Calls for Redoubled Efforts Amidst Catastrophic Humanitarian Crisis in Gaza to Aid Refugees (Jan. 29, 2024), <https://www.unrwausa.org/unrwa-usa-press-releases/unrwa-usa-horrified-by-allegations-against-some-unrwa-staff-calls-for-redoubled-efforts-amidst-catastrophic-humanitarian-crisis-in-gaza-to-aid-refugees>.

<sup>30</sup> *2023 annual report*, UNRWA USA, <https://www.unrwausa.org/2023-annual-report> (last visited Aug. 21, 2025).

<sup>31</sup> *2022 annual report*, UNRWA USA, <https://www.unrwausa.org/2022-annual-report> (last visited Aug. 21, 2025).

<sup>32</sup> *2021 annual report*, UNRWA USA, <https://www.unrwausa.org/2021-annual-report> (last visited Aug. 21, 2025).



58. In 2021, Defendant boasted that it was “[UNRWA]’s top institutional donor.”<sup>33</sup>

59. UNRWA USA works in close coordination with UNRWA to promote UNRWA’s programs in the United States. The two Defendants share messaging and materials and collaborate on outreach efforts, as UNRWA USA runs campaigns and informational sessions in order to promote UNRWA. Indeed, Defendants UNRWA and UNRWA USA host a number of webinars and other virtual events together. For instance, UNRWA USA has a thirty-seven-episode series called “Let’s Talk UNRWA,” where the vast majority of episodes feature a staff member or leader of UNRWA USA interviewing a staff member or leader from UNRWA to discuss UNRWA’s work.

60. Not only do Defendants share common missions, logos, finances, names, and activities, but they also have employed overlapping staff.

61. The official UNRWA USA “X” account has described UNRWA employee Motaz Azaiza<sup>34</sup> as “our [UNRWA USA’s] freelance content producer.”<sup>35</sup> Mr. Azaiza also identifies himself as a consultant for UNRWA USA and has made videos encouraging people to donate to UNRWA USA, which would then forward funds to his primary employer UNRWA.<sup>36</sup>

62. Karen AbuZayd, previously an UNRWA USA board member for many years, served as UNRWA Commissioner-General from 2005 to 2010 prior to her role at UNRWA USA, succeeding outgoing Commissioner-General Peter Hansen in 2005. Hamas won legislative elections in Gaza in 2006 and assumed total control over the Gaza Strip in 2007.

63. The official UNRWA USA “X” account refers to UNRWA employees as

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<sup>33</sup> *Id.*

<sup>34</sup> Motaz Azaiza becomes Gaza’s pivotal digital journalist, MENAFN (updated Oct. 4, 2023), <https://menafn.com/1107293317/Motaz-Azaiza-becomes-Gazas-pivotal-digital-journalist>.

<sup>35</sup> UNRWA USA (@unrwausa), X (Oct. 9, 2023, 3:30 PM), <https://twitter.com/unrwausa/status/1715088055260893582>.

<sup>36</sup> UNRWA USA (@unrwausa), *Our freelance content producer @motaz\_azaiza has a message for his US audiences*, Instagram (Jan. 12, 2024), <https://www.instagram.com/unrwausa/reel/C2BS1cxgh6n/>.

“colleagues” of UNRWA USA<sup>37</sup> and describes UNRWA USA as working “hand in hand” with UNRWA.<sup>38</sup>

64. Thus, at all relevant times, Defendant UNRWA USA worked with and provided material support to Defendant UNRWA to aid and sponsor its activities and programs, including its support and employment of Hamas.

***E. For Over a Decade, It Has Been Public Knowledge That UNRWA Employs Members of Hamas and That UNRWA’s Employee Union Is Controlled by Hamas.***

65. UNRWA and Defendant UNRWA USA’s activities and support for Hamas and other Gaza-based terrorist organizations have been well-documented and publicly known for over a decade.

66. Of the 12,521 UNRWA employees in Gaza, 1,462 or 12% are members of Hamas, PIJ, or another terrorist organization operating in Gaza.<sup>39</sup>

67. James Lindsay, who served as UNRWA’s general counsel from 2002 to 2007 and prior to that, spent two decades in the Criminal Division of the U.S. Department of Justice, told

*The New York Times*:

The U.N. has been unable and or unwilling to eliminate Hamas militants and their supporters, as well as those from other terrorist groups, from their ranks. UNRWA hiring practices and the makeup of the labor pool from which UNRWA draws its employees suggests to me that the numbers the Israelis are talking about are probably pretty close to the truth.<sup>40</sup>

68. In a July 2025 report released by the U.S. State Department, it was determined that

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<sup>37</sup> UNRWA USA (@unrwausa), X (Nov. 9, 2023, 2:03 PM), <https://twitter.com/unrwausa/status/1722691321301791127?s=20>.

<sup>38</sup> UNRWA USA (@unrwausa), *In conversation with @unrwausa about the critical situation on the ground in Gaza + what you can do to help*, Instagram (Oct. 27, 2023), [https://www.instagram.com/p/Cy6ZNB\\_RFNy](https://www.instagram.com/p/Cy6ZNB_RFNy).

<sup>39</sup> GOV’T OF ISRAEL, THE CONNECTION BETWEEN UNRWA AND HAMAS IN GAZA 4 (Apr. 23, 2025), <https://govextra.gov.il/media/qbep4ejj/the-connection-between-unrwa-and-hamas-280425.pdf>.

<sup>40</sup> Jo Becker & Adam Rasgon, *Records Seized by Israel Show Hamas Presence in U.N. Schools*, N.Y. TIMES (Dec. 8, 2024), <https://www.nytimes.com/2024/12/08/world/middleeast/hamas-unrwa-schools.html>.

“UNRWA is irredeemably compromised.” As a result of its findings, which included UNRWA’s participation in the October 7 Terror Attacks, the U.S. State Department “is maintaining a policy of minimal contact with” the organization.<sup>41</sup> Indeed, as a consequence of UNRWA’s role in the October 7 Terror Attacks, the Biden Administration halted all funding to UNRWA in January 2024, and the Trump Administration has maintained that posture.

69. As one senior State Department official stated, “UNRWA exists to provide cover for Hamas. They are completely corrupt and should be disbanded.”<sup>42</sup>

70. The United States’ decision to seek the termination of UNRWA reflects that UNRWA’s involvement in the October 7 Terror Attacks was not a function of a “few bad apples” but representative of a systemic infiltration and takeover of an organization by Gaza-based terrorist organizations, as Mr. Lindsay, former UNRWA general counsel, observed.

71. Much of this information has been publicly known and acknowledged for two decades, dating back to 2004 when then-UNRWA Commissioner-General Peter Hansen stated, “Oh, I am sure that there are Hamas members on the UNRWA payroll, and I don't see that as a crime.”<sup>43</sup>

72. At the time of Mr. Hansen’s comments, researchers observed that “there have been numerous cases of Palestinian terrorists employed by the UNRWA or using UNRWA facilities, equipment, and vehicles to carry out terror attacks.”<sup>44</sup> For example, “[b]etween 2000 and 2004 thirteen Palestinians employed by the UNRWA were arrested for alleged involvement in terror activities on behalf of a variety of terrorist groups, including Hamas.”<sup>45</sup>

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<sup>41</sup> Adam Kredo, *‘Irredeemably Compromised’: Trump Admin Tells Congress Hamas-Linked UNRWA Must Be Dismantled*, WASH. FREE BEACON (July 31, 2025), <https://freebeacon.com/trump-administration/trump-admin-tells-congress-hamas-linked-unrwa-is-irredeemably-compromised-and-must-be-dismantled/>.

<sup>42</sup> *Id.*

<sup>43</sup> MATTHEW LEVITT, HAMAS: POLITICS, CHARITY, AND TERRORISM IN THE SERVICE OF JIHAD 95 (2006).

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

73. Hamas also has “controlled the UNRWA Gaza staff union since 2009 and many UNRWA employees are affiliated with Hamas,” according to a Meir Amit Intelligence and Terrorism Information Center report published on April 24, 2017.<sup>46</sup> Hamas’s control of the UNRWA Gaza staff union has allowed it to heavily influence UNRWA’s mission (as opposed to its stated one), its culture, and its operational style in favor of Hamas.

74. To that point, even for criminal background checks, UNRWA employees are expected to self-report and provide a “clean record” from local authorities, also known as Hamas. That means, in addition to controlling the UNRWA Gaza staff union, Hamas also provides UNRWA with “background checks” for its employees.<sup>47</sup>

75. This approach has been confirmed in a recent whistleblower complaint from a former UNRWA employee, who claimed that Hamas representatives were permitted by UNRWA to “vet and approve” candidates for employment in the Gaza Strip. The complaint cites an instance in which a school principal reportedly had been hired, despite having previously been rejected for suspected terrorist affiliations.<sup>48</sup>

76. The whistleblower complaint also notes more generally that some UNRWA members were routinely influenced or directed by members of Hamas, and “[i]n several instances, UNRWA management had knowledge of, or even encouraged, such conduct.”<sup>49</sup>

77. Even prior to Hamas asserting control over the union, upon information and belief,

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<sup>46</sup> *Resignation of Suhail al-Hindi, chairman of the UNRWA staff union in the Gaza Strip, after exposure of his election to Hamas’ new Gazan political bureau*, THE MEIR AMIT INTELLIGENCE AND TERRORISM INFORMATION CENTER (Apr. 24, 2017), <https://www.terrorism-info.org.il/en/21194>; see also *Fact Checking UNRWA Claims About Teachers and Education*, UN WATCH (updated Nov. 7, 2023), <https://unwatch.org/fact-checking-unrwa-claims-about-teachers-and-education>.

<sup>47</sup> Becker & Rasgon, *supra* note 40.

<sup>48</sup> Jerusalem Post Staff, *Hamas influenced UNRWA hiring, operations in Gaza Strip, whistleblower reveals*, JERUSALEM POST (Aug. 17, 2025), <https://www.yahoo.com/news/articles/hamas-influenced-unrwa-hiring-operations-190639780.html>.

<sup>49</sup> *Id.*

the UNRWA Gaza staff union played a critical role in Hamas's electoral victory in Gaza in 2006. UNRWA workers had significant reach and influence, particularly through the UNRWA-run schools in Gaza. Upon information and belief, the UNRWA Gaza staff union gave Hamas access to the local population, allowing Hamas to campaign and share its message with Gazans.

78. This relationship between Hamas and the UNRWA Gaza staff union has been corroborated by Elliott Abrams, a Senior Fellow for Middle Eastern Studies at the Council on Foreign Relations and former Deputy National Security Advisor to the President and U.S. Special Representative to Iran. Mr. Abrams observed the following on September 1, 2014: "The UNRWA employees union is under Hamas control, and it's clear that the staff is riddled with Hamas 'activists.'"<sup>50</sup>

79. As a result of its control over both the Gaza staff union and the provision of background checks for UNRWA employment, Hamas exercises a strong and direct influence over UNRWA and its personnel.<sup>51</sup>

80. For example, in 2021, Hamas pressured UNRWA to re-assign its Gaza Director, Mathias Schmale, following Mr. Schmale's public comments that Israeli strikes did not target civilians.<sup>52</sup> In addition to caving to pressure from Hamas in its reassignment of Mr. Schmale, UNRWA also affirmatively expressed its solidarity with Hamas. Within weeks, in response to Mr. Schmale's nuanced comments and condemnation from Hamas, UNRWA Deputy Commissioner-General Leni Stenseth met with Hamas leader (and mastermind of the October 7 massacre) Yahya Sinwar at his office, where she apologized for Mr. Schmale's statements to the Israeli channel,

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<sup>50</sup> Elliott Abrams, *Which Side Is UNRWA On?*, COUNCIL ON FOREIGN RELATIONS (updated Sep. 1, 2014), <https://www.cfr.org/blog/which-side-unrwa>.

<sup>51</sup> *Fact Checking UNRWA Claims About Teachers and Education*, *supra* note 42.

<sup>52</sup> *Id.*; see also *UN agency withdraws director from Gaza after threats*, ASSOCIATED PRESS (updated June 4, 2021), <https://apnews.com/article/united-nations-middle-east-b03eb29c5b9286fff1d6b80cf6539294>.

which she said could not be defended in any way.<sup>53</sup>

81. At that meeting, Stenseth confirmed her understanding of Sinwar's outrage to the statements and "affirmed her solidarity" with Hamas on behalf of UNRWA.<sup>54</sup>

82. In April of 2022, less than a year after expressing her solidarity with Hamas, Ms. Stenseth, in her capacity as UNRWA's Deputy Commissioner-General, was a guest speaker and expert for Defendant UNRWA USA's live-streamed "Let's Talk UNRWA" series. Her event was entitled "UNRWA HQ Update with Leni Stenseth."<sup>55</sup>

83. Similarly, in April 2023, Hamas pressured UNRWA to reinstate a suspended teacher who endorsed terrorism by publicly celebrating the massacre of Jews in a Jerusalem synagogue.<sup>56</sup>

84. The pressure Hamas exerts over UNRWA's staffing is not merely demonstrated by what UNRWA does but also by what it *does not* do. UNRWA has publicly admitted that it does not independently investigate neutrality breaches—it does so only when it receives an allegation of a breach (and even then, a majority of time, it does not investigate those allegation).

85. Indeed, the recently-killed head of Hamas's Lebanon branch, Ratah Sharif Abu el-Amin, was the head of UNRWA's teachers' union in Lebanon, overseeing 65 schools and 40,000 students. He was also the principal of an UNRWA school in southern Lebanon. Prior to his death, UNRWA had been provided with extensive documentation of Sharif's attendance at Hamas events, rallies, and funerals. He was also photographed often with Hamas leaders, some of whom attended

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<sup>53</sup> *UNRWA official expresses understanding to Sinwar*, AL MAYADEEN (June 3, 2021) <https://english.almayadeen.net/news/politics/1485841/unrwa-official-expresses-understanding-to-sinwar>.

<sup>54</sup> *Id.*

<sup>55</sup> *Let's Talk UNRWA: Monthly Speaker Series*, UNRWA USA, <https://www.unrwausa.org/lets-talk-unrwa> (last visited Mar. 5, 2024).

<sup>56</sup> *Fact Checking UNRWA Claims About Teachers and Education*, *supra* note 42; *see also* Dina Rovner, *UNRWA: A neutral agency or a political tool to attack Israel? – opinion*, JERUSALEM POST (updated May 11, 2023), <https://www.jpost.com/opinion/article-742656>.

his son's wedding, and he proudly promoted Hamas's leadership on his Facebook account. Hillel Neuer, executive director of the U.N watchdog group U.N. Watch, had notified Philippe Lazzarini, commissioner general of UNRWA, "again and again" of Sharif's membership in Hamas. "We gave them a huge dossier with the evidence," stated Neuer. "Everyone at UNRWA knew. Yet they refused to act."<sup>57</sup>

86. UNRWA has no interest in policing its ranks. Between 2022 and February 2025, UNRWA conducted an investigation into only 66 of its 30,000 of its staff or 0.22%, despite the fact that UNRWA has been made aware of hundreds of its employees either celebrating Hamas, having ties to Hamas, or being a member of Hamas.<sup>58</sup> As *The New York Times* noted in its reporting of a sample of materials provided by the Israeli government, "In several cases, educators remained employed by UNRWA even after Israel provided written warnings that they were militants."<sup>59</sup>

87. In one instance, U.N. investigators were shown a video of an UNRWA social worker throwing the body of deceased Nova Music Festival attendee Yonatan Samerano into an UNRWA jeep. Mr. Samerano had fled the Nova Music Festival during the October 7 Terror Attacks, only to be killed at Kibbutz Be'eri. Footage from the kibbutz security cameras captured the UNRWA employee kidnapping his body back to Gaza. Mr. Samerano's body was later recovered in Gaza by the Israeli Defense Forces. Despite the fact that an UNRWA employee was at Kibbutz Be'eri on October 7, 2023, and kidnapped the body of a deceased Israeli civilian using his UNRWA vehicle, the U.N. investigators still determined only that the worker "may have" been involved in the October 7 Terror Attacks—<sup>60</sup>a simply astounding determination emblematic of the

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<sup>57</sup> Mike Wagenheim, *UNRWA can't fully vet staff for Hamas ties, because it lacks police, intelligence unit, United Nations says*, JEWISH NEWS SYNDICATE (Oct. 1, 2024), <https://www.jns.org/unrwa-cant-fully-vet-staff-for-hamas-ties-because-it-lacks-police-intelligence-unit-united-nations-says/>.

<sup>58</sup> *Fact-Checking UNRWA's "Claims Versus Facts,"* UN WATCH (Feb. 28, 2025), <https://unwatch.org/deconstructing-unrwa-facts/>.

<sup>59</sup> Becker & Rasgon, *supra* note 40.

<sup>60</sup> *Id.*

lack of oversight that UNRWA exercises over its employees.

88. Furthermore, the U.N. Office of Internal Oversight said it refused to consider evidence that Israel provided about UNRWA employees’ “alleged membership of the armed wing of Hamas or other militant groups” when assessing whether UNRWA workers may have been involved in the October 7 Terror Attacks.<sup>61</sup>

***F. For Over a Decade, It Has Been Public Knowledge That UNRWA Employs Hamas Members in Particular as Teachers and Spreads Terrorist Propaganda against Jewish People and Israel.***

89. Hamas’s control over the UNRWA Gaza staff union means that members of Hamas are able to comfortably secure employment at UNRWA.

90. Defendants UNRWA and UNRWA USA have supported Hamas by employing current Hamas members and Hamas supporters as UNRWA teachers, thereby indoctrinating hundreds of future Hamas members in UNRWA schools.

91. Part of the mission of Hamas and other FTOs operating in Gaza is to recruit new members and to propagandize the public. Through UNRWA’s school system, Hamas and other FTOs are able to do just that.

92. Of the 546 principals and deputy-principals in UNRWA’s education facilities in Gaza, at least 80 or 15% are members of a terrorist organization.<sup>62</sup>

93. As succinctly reported by *The New York Times* in December 2024 when investigating Hamas’s takeover of UNRWA schools, “Residents of Gaza said in interviews that the idea that Hamas had operatives in UNRWA schools was an *open secret*. One educator ... was regularly seen after hours in Hamas fatigues carrying a Kalashnikov.”<sup>63</sup> (emphasis added).

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<sup>61</sup> *Id.*

<sup>62</sup> GOV’T OF ISRAEL, *The Connection Between UNRWA and Hamas in Gaza*, at 4 (Apr. 23, 2025), <https://govextra.gov.il/media/qbep4ejj/the-connection-between-unrwa-and-hamas-280425.pdf>.

<sup>63</sup> Becker & Rasgon, *supra* note 40.



94. Additional reporting from *The New York Times* focused on 24 UNRWA school employees at 24 different schools—the majority as principals and deputy principals—who were revealed to be members of Hamas or PIJ. Almost all of the Hamas members-cum-teachers were fighters in Hamas’s military brigade.<sup>64</sup>

95. Infamous Hamas leader Ismail Haniyeh was a teacher in UNRWA schools.<sup>65</sup>

96. Mohammed Abu Itiwi, a now-deceased Hamas Nukhba special forces commander and participant in the October 7 Terror Attacks, had been an UNRWA employee since 2022.

97. Ahmad al-Khatib, deputy principal at an UNRWA elementary school in Gaza, served as a squad commander in Hamas’s military wing prior to his death following the October 7 Terror Attacks. He had been an employee of UNRWA since 2013.

98. Mustafa al-Farra is an UNRWA teacher in Jabalia who had been issued an AK-47 as a member of Hamas’s military brigade.

99. Ayman al-Alami, another UNRWA teacher in Khan Younis, participated in a rocket-launching training course in 2023 as a member of Hamas’s military brigade.

100. As discussed prior, Hamas’s Lebanon leader, Ratah Sharif Abu el-Amin, was the principal of an UNRWA school in southern Lebanon at the time of his death in September 2024.

101. Suhail Ahmed Hassan al-Hindi served as a principal of the Palestine Boys’ Elementary School, an UNRWA school, while also being elected to Hamas leadership. UNRWA did not suspend him for his ties to a terrorist organization but rather for engaging in “political activity.”<sup>66</sup>

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<sup>64</sup> *Id.*

<sup>65</sup> MEMRI TV, *Former UNRWA Official Ahmad Oueidat: Hamas Leader Ismail Haniyeh Was A Teacher In One Of Our Schools, As Was PFLP-GC Leader Talal Naji; The West Tried To Corrupt Our Curricula* (Mar. 14, 2024), <https://www.memri.org/tv/fmr-unrwa-official-ahmad-oueidat-schools-rise-palestinian-leadership-hamas-ismail-haniyeh-pflp-talal-naji>.

<sup>66</sup> *UN agency suspends staffer accused of senior Hamas role*, TIMES OF ISRAEL (Feb. 26, 2017), <https://www.timesofisrael.com/un-agency-suspends-staffer-accused-of-senior-hamas-role>.

102. Naji Abu Aziz, principal of Khuza'a Prep Boys School, is a member of Hamas's military manufacturing department, a fact that Israel's foreign ministry alerted UNRWA to in 2011. UNRWA refused to suspend or fire him, even after a seized Hamas communique confirmed his membership in Hamas's military manufacturing department in 2020.<sup>67</sup>

103. Khaled al-Masri, principal of the Maghazi Prep B Boys School in central Gaza, is a Hamas member who has been issued an assault rifle and a handgun and is pictured standing in front of a Hamas banner on Facebook. At one point during his tenure, a tunnel was discovered beneath his school in 2017. He remains on UNRWA's staff.<sup>68</sup>

104. Mohammed Shuwaideh, a Hamas deputy squad commander, also serves as the principal of Al-Zaytun Boys Preparatory and Elementary Schools in Gaza. In February 2024, a tunnel shaft was discovered next to his school. UNRWA was notified of the matter, but did not remove the principal. It wasn't until *The New York Times* questioned UNRWA about Mr. Shuwaideh that he was placed on administrative leave—*nine months after the tunnel shaft was discovered*.<sup>69</sup>

105. UNRWA USA's website acknowledges, "Education is UNRWA's largest program."<sup>70</sup> UNRWA USA has played a direct role in UNRWA's education system, as UNRWA USA proudly provided UNRWA with \$674,995 in 2022 to support "education and training" in UNRWA schools and \$256,776 in 2023.<sup>71</sup>

106. As a result of a significant portion of UNRWA schools being run by terrorists, UNRWA's education system glorifies and teaches terrorism. In fact, "[t]eachers and schools at

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<sup>67</sup> Becker & Rasgon, *supra* note 40.

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> *education + training*, UNRWA USA, <https://www.unrwausa.org/pillars/education> (last visited Mar. 5, 2024).

<sup>71</sup> 2022 annual report, *supra* note 30.

[UNRWA] that run[] education and social services for Palestinians regularly call to murder Jews, and create teaching materials that glorify terrorism, encourage martyrdom, demonize Israelis and incite antisemitism.”<sup>72</sup>

107. For example, according to a March 2023 report jointly issued by Israeli non-profit IMPACT-se and UN Watch, fifth-grade students in the Al-Zaytun Elementary School in the Gaza Strip have been given UNRWA-provided classroom materials that venerate Dalal Mughrabi, a Fatah terrorist who massacred 38 Israeli civilians.<sup>73</sup>

108. In that same March 2023 report, it was revealed that at the Al-Maghazi Middle School for Boys B, ninth-grade students are given reading comprehension lessons that celebrate a Palestinian firebombing attack on Jews in Ramallah by referring to it as a “Barbecue Party.”<sup>74</sup>

109. According to the same March 2023 report, at another UNRWA-funded school, the Asma Middle School for Girls B, schoolgirls are taught about “Loving the Homeland,” which teaches students that “the most precious thing” is “to nourish the homeland with [their] blood” through self-sacrifice.<sup>75</sup> A grammar lesson in this classroom contained the following sentence examples: “I will commit jihad to liberate the homeland,” “We Palestinians resisted the Occupation,” and “I will not give up a centimeter of my land.”<sup>76</sup>

110. In all, the report “identifies 133 UNRWA educators and staff who were found to promote hate and violence on social media, and an additional 82 UNRWA teachers and other staff affiliated with over 30 UNRWA schools involved in drafting, supervising, approving, printing,

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<sup>72</sup> *UN Teachers Call To Murder Jews, Reveals New Report*, UN WATCH (Mar. 14, 2023), <https://unwatch.org/un-teachers-call-to-murder-jews-reveals-new-report>.

<sup>73</sup> UN WATCH & IMPACT-se, UNRWA EDUCATION: REFORM OR REGRESSION? 43-47 (2023), [https://www.impact-se.org/wp-content/uploads/UNRWA\\_Report\\_2023\\_IMPACT-se\\_And\\_UN-Watch.pdf](https://www.impact-se.org/wp-content/uploads/UNRWA_Report_2023_IMPACT-se_And_UN-Watch.pdf).

<sup>74</sup> *See id.* at 48.

<sup>75</sup> *Id.* at 55.

<sup>76</sup> *Id.*

and distributing hateful content to students.”<sup>77</sup>

111. The violent, jihadist nature of the educational materials at UNRWA schools should come as no surprise, given the proportion of either principals or deputy principals at UNRWA schools that are members of FTOs, and in particular, Hamas. UNRWA schools are Hamas’s primary tool of recruitment and propagandizing.

112. Amongst the remaining teachers who are not members of FTOs, support for Hamas is still quite strong.

113. In the wake of the October 7 Hamas Terrorist Attacks, UN Watch and IMPACT-se published another report detailing the sheer, unadulterated jubilation expressed by UNRWA teachers upon learning of Hamas’s brutality.<sup>78</sup> “UNRWA teachers in a 3,000-member UNRWA staff Telegram group cheered and celebrated Hamas’s October 7th massacre while at the same time asking when their UNRWA salaries will be paid.”<sup>79</sup>

114. The Telegram group, titled “UNRWA-Gaza Daily Vacancies” and bearing the UNRWA logo, describes itself as “[a]n interactive group for all education workers at the International Relief Agency ‘UNRWA’ – Gaza Region.”<sup>80</sup>

115. The UNRWA Telegram group discussed topics that were common among UNRWA employees, like teacher salaries, school holidays, and supporting terrorism against Israel.<sup>81</sup>

116. As the October 7, 2023, attacks were still ongoing, “[t]he UNRWA staff in the

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<sup>77</sup> *UN Teachers Call To Murder Jews*, *supra* note 53.

<sup>78</sup> See generally UN WATCH, UNRWA’S TERRORGRAM: HOW A TELEGRAM GROUP OF 3,000 UNRWA TEACHERS IN GAZA CELEBRATED THE OCTOBER 7<sup>TH</sup> HAMAS MASSACRE (2024), available at <https://unwatch.org/wp-content/uploads/2024/01/UN-Watch-UNRWA-Terrorgram-.pdf>.

<sup>79</sup> *Evidence Shows Widespread Support for October 7<sup>th</sup> Terrorists Among UNRWA Teachers in Gaza*, UN WATCH (Jan. 2024), <https://unwatch.org/unrwa-terrorgram>.

<sup>80</sup> *UNRWA: Refuting UN Claim That Terrorgram is Not for UNRWA Employees*, UN WATCH (Feb. 6, 2024), <https://unwatch.org/unrwa-refuting-un-claim-that-terrorgram-is-not-for-unrwa-employees>.

<sup>81</sup> UNRWA’S TERRORGRAM, *supra* note 59, at 22, 30-62.

group shared photos and video footage of those events and prayed for the terrorists' success and for Israel's destruction, in clear violation of UN rules."<sup>82</sup>

117. For example, the Telegram group admin and UNRWA employee Israa Abdul Kareem Mezher celebrated the massacre, writing "God is the greatest God is the greatest" and "Israel's time is over."<sup>83</sup>

118. Another UNRWA employee Waseem Medhat Abu El Ula wrote in the group chat, "execute the first settler."<sup>84</sup>

119. On the morning of October 7, 2023, UNRWA Math teacher Shatha Husam Al Nawajha ("Shatha Elnawajha") posted in the Telegram group: "May God protect them and guide their aim." Ms. Elnawajha wished not only for "victory," but also hoped that Hamas would return safe "and with booty."<sup>85</sup>

120. The UN Watch report identified thirty members of the UNRWA Telegram group that glorified and cheered on the Hamas terrorist attacks on October 7, 2023.<sup>86</sup>

121. This Telegram report supplemented a prior UN Watch report detailing "over 150 UNRWA staff Facebook pages that contain antisemitism and incitement to jihadi terrorism" dating back to 2015.<sup>87</sup> For example, an UNRWA teacher and translator, Mahmoud Khalil, posted a tweet in May 2021 lauding Hamas attacks against Israel and shared a post lionizing Palestinian terrorist Udai Tamimi, who was responsible for the murder of an IDF soldier.<sup>88</sup> An UNRWA math teacher, Adnan Shteivi, applauded the terrorists responsible for a shooting attack in Bnei Brak in March

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<sup>82</sup> *Id.* at 1.

<sup>83</sup> *Id.*

<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> *See id.* at 1-17.

<sup>87</sup> *Id.* at 1.

<sup>88</sup> Tzi Joffe, *UNRWA continues to teach and spread hate to Palestinians, report states*, JERUSALEM POST (Mar. 14, 2023), <https://www.jpost.com/middle-east/article-734321>.

2022.<sup>89</sup>

122. UNRWA USA’s funding of the UNRWA education system not only helps to glorify terrorism and recruit for Hamas, but it also pays the salaries of UNRWA school teachers who are members of Hamas or openly align themselves with Hamas. Therefore, UNRWA USA knowingly funds terrorism, insofar as it knows that UNRWA employs members of FTOs, including Hamas, in its schools.

***G. For a Decade, It Has Been Publicly Known That Hamas and Other Terrorist Organizations Have Used UNRWA Schools to Store Weapons and Make Military Plans.***

123. UNRWA schools have a long history of hiding weapon caches and other apparatus for terrorists. As Hamas military plans explicitly reveal, schools and other civilian facilities serve as “the best obstacles to protect the resistance.”<sup>90</sup>

124. During the 2014 Israel-Hamas war, UNRWA admitted—for the second time—that it “discovered” weapons hidden inside UNRWA’s Gaza Beach Elementary Co-Education “B” School but asserted that the school was “vacant.”<sup>91</sup>

125. On April 27, 2015, the U.N. Secretary-General sent a report to the President of the Security Council, disclosing the findings of a U.N. board of inquiry that was investigating damage to UNRWA properties during the same 2014 war. In line with UNRWA’s “discovery,” the report confirmed that an “unidentified Palestinian armed group” hid approximately 20 rockets inside the Gaza Beach Elementary Co-educational “B” School.<sup>92</sup> The gate to the schoolyard remained unlocked during this period, however, to “to allow children access to the schoolyard,” meaning

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<sup>89</sup> *Id.*

<sup>90</sup> Becker & Rasgon, *supra* note 40.

<sup>91</sup> Press Release, UNRWA, UNRWA Condemns Placement of Rockets, for a Second Time, in One of Its Schools (July 22, 2014), <https://www.unrwa.org/newsroom/press-releases/unrwa-condemns-placement-rockets-second-time-one-its-schools>.

<sup>92</sup> U.N. SECRETARY-GENERAL, *Summary by the Secretary-General of the report of the United Nations Headquarters Board of Inquiry into certain incidents that occurred in the Gaza Strip between 8 July 2014 and 26 August 2014*, ¶¶ 58-59, U.N. Doc. S/2015/286 (Apr. 27, 2015).

contrary to UNRWA's assertions, the school was not actually "vacant."<sup>93</sup> Mysteriously, one set of keys to the school's classrooms remained unaccounted for.<sup>94</sup>

126. Additionally, according to the same report, rockets were discovered and hidden inside the UNRWA Nuseirat Preparatory Co-Educational "B" School on July 29, 2014, and again on August 17, 2014.<sup>95</sup> When UNRWA reported the presence of the weapons and asked for the weapons to be removed, security personnel could not remove the rockets because of the poor security situation.<sup>96</sup> The very next day, UNRWA officials went to the school only to find no proper security, a broken gate lock, and the weapons gone.<sup>97</sup>

127. Additionally, military plans, written in Arabic, were present on the blackboard inside the UNRWA Nuseirat Preparatory Co-Educational "B" School.<sup>98</sup> The board of inquiry concluded there was evidence that the UNRWA school "could have been used for an unknown period of time by members of a Palestinian armed group and that it was likely that such a group may have fired the mortar [shells of which had been found] from within the premises of the school."<sup>99</sup>

128. In the same report, the U.N. board of inquiry also concluded that "it was highly likely an unidentified Palestinian armed group could have used the school premises" of another UNRWA school, Jabalia Elementary "C" and Ayyobiya Boys School, "to launch attacks on or around 14 July 1 [2014]."<sup>100</sup>

129. According to an NGO Monitor report dated January 18, 2023, in the last ten years,

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<sup>93</sup> *Id.* at ¶ 53.

<sup>94</sup> *Id.*

<sup>95</sup> *Id.* at ¶¶ 71-82.

<sup>96</sup> *Id.* at ¶ 77.

<sup>97</sup> *Id.* at ¶ 78.

<sup>98</sup> *Id.* at ¶ 80.

<sup>99</sup> *Id.* at ¶ 82.

<sup>100</sup> *Id.* at ¶ 70.

UNRWA has admitted to over half a dozen of its schools sitting atop Hamas tunnels or within their close vicinity.<sup>101</sup> For instance:

- In June 2017, UNRWA admitted to one Hamas tunnel beneath two of its schools in the central Gaza strip—Maghazi Elementary Boys A&B School and the Maghazi Preparatory Boys School.
- In October 2017, UNRWA revealed another Hamas tunnel under the UNRWA boys' middle school in Beit Hanoun in the northern Gaza Strip.
- In June 2021, UNRWA admitted to another Hamas tunnel under UNRWA's Zaitoun Preparatory Boys' School in Gaza City.
- In June 2022, the IDF revealed another Hamas tunnel in close proximity to UNRWA's Daraj elementary school.
- In December 2022, UNRWA admitted to the presence of another tunnel beneath one of its Gaza schools.
- That same month, the IDF identified a Hamas rocket launching site next to UNRWA's Mo'ath Bin Jabal School in Gaza City. The school's principal had previously been in touch with Hamas commander Jalal Abu Aoun who had operated the launching site.

130. In 2021, the United States State Department noted in a non-classified report that in 2021 alone, “298 security and conflict-related incidents with neutrality implications occurred in 2021 ... [including] unauthorized use of UNRWA installations, such as armed, non-UNRWA personnel attempting to distribute supplies to civilians on UNRWA grounds” and “the use of weapons in or near facilities.”<sup>102</sup>

#### ***H. UNRWA Facilitates Hamas's Money-Laundering Operation.***

131. UNRWA's method of paying its employees in Gaza enables Hamas to launder millions of U.S. dollars.

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<sup>101</sup> *Tunnels Under Schools: NGO Human Rights' Monitoring for Palestinian Children Ends When Israel is Not to Blame*, NGO MONITOR (Jan. 18, 2023), <https://www.ngo-monitor.org/tunnels-under-schools-ngo-human-rights-monitoring-for-palestinian-children-ends-when-israel-is-not-to-blame>.

<sup>102</sup> Adam Kredo, *After \$150 Million Boost From Biden, UN Agency Cited for Inciting Violence Against Jews*, WASH. FREE BEACON (July 13, 2022), <https://freebeacon.com/national-security/after-150-million-boost-from-biden-un-agency-cited-for-inciting-violence-against-jews>.



132. Gaza uses the Israeli shekel for daily transactions. While most employers in Gaza pay their employees in the Israeli shekel, UNRWA pays its Gaza employees in U.S. dollars and in cash.

133. In contrast, upon information and belief, UNRWA pays its employees elsewhere—in Lebanon, Syria, Jordan, and the West Bank—in local currency.

134. Because merchants in Gaza generally (and understandably) do not accept U.S. dollars, UNRWA's Gaza employees are forced to turn to local moneychangers to exchange the sums of their paychecks for shekels.

135. However, Hamas operates the majority of moneychangers in Gaza, meaning Hamas collects a “fee” for each exchange it performs. In those instances in which the moneychangers are not operated by Hamas, the moneychangers must pay share a portion of their exchange fee with Hamas.

136. This arrangement ensures that Hamas is able to collect a portion of each UNRWA paycheck that is exchanged for Israeli shekels. With U.S. dollars in hand, Hamas is then able to purchase weapons and other equipment on the international black market that may then be smuggled into Gaza.

137. Since at least 2018, the UN has been aware of the risk posed by distributing disbursements in cash, referring to it as “leakage” in its risk statements and audits. A 2018 report commissioned by UNRWA warned that generally disbursing money in cash poses money laundering risks, insofar as funds could be diverted to terrorists or other nefarious actors.

138. Upon information and belief, each month, UNRWA instructs JP Morgan Chase to wire earnings in U.S. dollars, via Arab Bank in New York, to Arab Bank's Ramallah branch in the West Bank. Earnings for UNRWA employees in the West Bank are then converted to Israeli

shekels and disbursed to UNRWA's West Bank employees. In contrast, upon information and belief, earnings for UNRWA employees in Gaza are transferred to the Bank of Palestine in Ramallah, where they are withdrawn in cash and transported by truck across Israeli territory into Gaza. Transporting millions of U.S. dollars by truck poses serious security concerns that could be easily avoided if UNRWA paid its Gaza staff in the manner it pays its West Bank staff.

139. Upon information and belief, since 2018, two-thirds of the U.S. dollars floating through the Gazan economy originated from UNRWA.

140. Meanwhile, Hamas has used these U.S. dollars to purchase weapons, ammunitions, explosives, construction materials for the tunnels, and rocket-making supplies, including for the October 7 Terror Attacks.

141. UNRWA's elaborate—and completely unnecessary—system for paying its employees in Gaza ensures that Hamas continues to enjoy a steady stream of U.S. dollars.

142. UNRWA knowingly facilitates Hamas's money laundering operation and, in doing so, facilitates Hamas's terrorism. UNRWA does not *have* to pay its Gaza employees in U.S. dollars, but rather *chooses* to do so.

***I. Prior to the October 7 Terror Attacks, UNRWA Leadership Regularly Met with Hamas.***

143. For years, UNRWA officials routinely met with Hamas and other terrorist organizations, praising them for their “cooperation” and referring to them as “partners.” Often times, these meetings would take place in Lebanon, where Hamas and other FTOs have outposts, in order to be more discreet.

144. In turn, the terrorist groups frequently influenced UNRWA's decisions, finding sympathetic ears amongst the upper echelons of UNRWA's leadership, who share Hamas's hatred of Israel.

145. Many of the meetings featured terrorists from a variety of organizations designated Foreign Terrorists Organizations (“FTOs”) by the U.S. State Department. Those groups include Hamas, Palestine Liberation Front (“PLF”), Palestine Islamic Jihad (“PIJ”), Popular Front for the Liberation of Palestine (“PFLP”), PFLP-General Command (“PFLP-GC”), and the Democratic Front for the Liberation of Palestine (“DFLP”). Despite the DFLP being delisted by the U.S. State Department in 1999, all of the groups took part in the October 7 Terror Attacks.

146. UNRWA managers have attended and participated in Hamas’s annual conference, where Hamas discusses UNRWA internal affairs, including employee vacancies and UNRWA Teachers Union elections (which, as discussed prior, are very important for Hamas’s control over UNRWA employment decisions). For instance, at Hamas’s 2021 conference, Hamas official Ahmad Abd-Al-Hadi announced the start of a joint committee to “supervise the relationship with UNRWA and ensure it implements its obligations.”<sup>103</sup>

147. In September 2013, **Ann Dismorr**, former UNRWA Director-General in Lebanon met with Hamas leader and head of the UNRWA Lebanon Teachers Union Fathi Al-Sharif at a ceremony at his school.<sup>104</sup>

148. In both 2013 and 2015, **Ibrahim Al-Khatib**, UNRWA Sidon Director in Lebanon had meetings with senior Hamas leadership in Lebanon. Since then, Al-Khatib attends Hamas’s yearly summit on UNRWA, where he delivers statements on behalf of UNRWA.<sup>105</sup>

149. In December 2014, all of **UNRWA’s regional directors in Lebanon** met Hamas leader Ali Baraka in order to congratulate him on the twenty-seventh anniversary of the founding

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<sup>103</sup> UN WATCH, THE UNHOLY ALLIANCE: UNRWA, HAMAS, AND ISLAMIC JIHAD 4 (2024), available at <https://www.unwatch.org/wp-content/uploads/2025/01/UNW-129—The-Unholy-Alliance—2025-01-09—Web—Singles.pdf>.

<sup>104</sup> *Id.* at 42.

<sup>105</sup> *Id.* at 44, 48.

of Hamas and to emphasize “the importance of cooperation and coordination.”<sup>106</sup>

150. In May 2015, then UNRWA Director-General in Lebanon **Matthias Schmale**, met with Hamas spokesperson Jihad Taha and PIJ’s Hajj Abu Samer. Following the meeting, Schmale was taken on a tour where armed men were dressed in civilian clothing.<sup>107</sup>

151. In July 2015, **Hajj Fawzi Kassab**, UNRWA Tyre Director, attended an Iftar holiday meal at the home of the Houthi Secretary-General in Lebanon, Jamal Suleiman.<sup>108</sup>

152. In November 2015, **Mr. Schmale** met with Ali Baraka, Hamas’s Head of Foreign Relations (recently indicted by the U.S. Department of Justice), to discuss job loss among UNRWA teachers, stressing that UNRWA’s job is to provide relief and employment to Palestinians “until they return to their homes,” presumably perceived to be in Israel proper.<sup>109</sup>

153. In November 2016, then-Director-General of UNRWA in Lebanon **Hakam Shahwan** met with Hamas’s Jihad Taha and PIJ’s Hajj Abu Samer Musa.<sup>110</sup>

154. Former UNRWA Commissioner-General **Pierre Krähenbühl** met with terrorist leaders from Hamas and PIJ in Lebanon in February 2017, where he emphasized the “spirit of partnership” between them and UNRWA. He invited the terrorist leaders to privately challenge any UNRWA decision which he could then change or “tear up.” Mr. Krähenbühl urged the terrorist groups to make sure that their “discussions not be made public” in order to avoid damaging UNRWA’s “credibility.”<sup>111</sup> Present at this meeting was Ali Baraka, who had proudly declared that Hamas had been planning the attack for two years.<sup>112</sup> Also present was Abu Imad Al-Rifai, the leader of PIJ in Lebanon who had once boasted about sending a group of suicide bombers to

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<sup>106</sup> *Id.* at 43.

<sup>107</sup> *Id.* at 34.

<sup>108</sup> *Id.* at 50.

<sup>109</sup> *Id.* at 34.

<sup>110</sup> *Id.* at 38.

<sup>111</sup> *Id.* at 3.

<sup>112</sup> *Id.* at 20.

Baghdad to kill American and British troops.<sup>113</sup> Ali Faisal, a senior member of Democratic Front for the Liberation of Palestine (DFLP) (another group that participated in the October 7 Terror Attacks) was also present.<sup>114</sup> Faisal oversaw some of the DFLP's most extensive terrorist attacks, including the 1974 Ma'a lot massacre in which 28 Israelis were killed. The DFLP originally was part of the PFLP. Salah Al-Youssef, leader of the Lebanon branch of the Palestine Liberation Front ("PLF"), an FTO, was also present.<sup>115</sup>

155. That same month, then-UNRWA Lebanon Director **Mr. Shahwan**, along with **Mr. Krähenbühl** and **Gwyn Lewis**, then-UNRWA Deputy Director of Programs in Lebanon, met with various terrorist leaders—including from PFLP, PLF, PIJ, Hamas, and DFLP—at UNRWA's headquarters in Beirut. There, Mr. Shahwan assured terrorist leaders that UNRWA was "fully prepared" to enjoy a "strong partnership mechanism" with the terrorist groups, so long as the perception is not that "we are partners in the decision-making."<sup>116</sup>

156. In 2017, **Claudio Cordone**, then-UNRWA Lebanon Director, along with UNRWA Deputy Director of Programs Gwyn Lewis, met with, *inter alia*, Ali Baraka (Hamas), Abu Imad Al-Rifai (PIJ in Lebanon), and Ali Faisal (DFLP).<sup>117</sup>

157. In October 2017, **Mr. Kassab** met with Hamas leader Abdul Majeed Al-Awad in Tyre, where the two "agreed on the need for continuous coordination" between UNRWA and Hamas.<sup>118</sup>

158. UNRWA regional directors regularly meet with local terrorist leaders for the purposes of "cooperation and coordination." At a November 2017 meeting with UNRWA's Sidon

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<sup>113</sup> *Id.*

<sup>114</sup> *Id.* at 21.

<sup>115</sup> *Id.*

<sup>116</sup> *Id.* at 39.

<sup>117</sup> *Id.* at 26.

<sup>118</sup> *Id.* at 51.

Director **Fawzi Kassab**, terrorist leaders threatened to start a “popular revolution” if donors stopped funding UNRWA.<sup>119</sup>

159. In December 2017, **Mr. Al-Khatib** met with Hamas Liaison Ahmed Fadl Taha to discuss UNRWA refugees living in Lebanon.<sup>120</sup>

160. In January 2018, then-UNRWA Lebanon Director **Mr. Cordone** met with Hamas official Ahmad Abd al-Hadi. In that meeting, al-Hadi asserted Hamas’s support for UNRWA.<sup>121</sup>

161. The following month, UNRWA Program Director in Lebanon **Ms. Lewis** met with Hamas official Abu Ahmad Fadl, where the two agreed on “ongoing cooperation and coordination.” Mr. Fadl was a friend of the infamous Hamas leader Ismail Haniyeh and took up arms for Hamas.<sup>122</sup>

162. That summer, in August 2018, **Mathias Schmale**, then-UNRWA Lebanon Director appeared at a Hamas rally and addressed the crowd alongside Ali Baraka, one of the six Hamas terrorist leaders that the U.S. Department of Justice indicted in September 2024. Baraka told the crowd that donor states must support UNRWA “until we return to Palestine.” Afterwards, Mr. Schmale thanked the terrorist groups “for their understanding” and reassured them that UNRWA was on their side.<sup>123</sup>

163. That same month, **Mr. Cordone** met with Hezbollah Political Council member Hassan Hoballah, the Hezbollah official in charge of Palestinian relations who conceded after the October 7 Terror Attacks that Hamas fighters were “trained in Lebanon, Syria, and Iran.” He has previously stated that Hezbollah “has an alliance with the Palestinian resistance on every level”

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<sup>119</sup> *Id.*

<sup>120</sup> *Id.* at 49.

<sup>121</sup> *Id.* at 27.

<sup>122</sup> *Id.* at 33.

<sup>123</sup> *Id.* at 36.

and “aids the Palestinian resistance with everything it has,” including “weapons and training.” The purpose of the meeting was discuss pressures UNRWA faced to cancel refugee status for those born after 1948 (a standard practice for all non-Palestinian refugees).<sup>124</sup>

164. In February 2019, then-UNRWA Commissioner-General **Pierre Krähenbühl** and former UNRWA Lebanon Director **Mr. Cordone** met with Hamas Political and Media Relations Officer Abdul Majeed Al-Awad at an UNRWA school in southern Lebanon. Mr. Al-Awad is a key coordinator between Hamas and Hezbollah and has been invaluable in their communications since the October 7 Terror Attacks.<sup>125</sup>

165. That same day, Mr. **Krähenbühl** and **Mr. Cordone** met with Ayman Shana’a, Hamas Head of National Relations in Lebanon; Khaled Zuaiter, Hamas political relations officer; and Jamal Khattab, Sheikh of Palestinian Islamic Jihad in Lebanon. During the course of that meeting, Mr. Shana’a emphasized the importance of “considering the Palestinian factions as a basic partner for UNRWA in preserving the dignity of our people and our camps with all the meanings they symbolize.” In the wake of the October 7 Terror Attacks, Mr. Shana’a has recruited hundreds of young Gazans to join Hamas.<sup>126</sup>

166. In March 2019, current UNRWA Commissioner-General **Philippe Lazzarini**, when serving as the UN Special Coordinator for Lebanon, met with Hamas leader Hajj Izzat Mansour in the Baalbek region of Lebanon. Mansour had previously met with local UNRWA officials to discuss vacant teaching positions at UNRWA schools, calling on UNRWA to fill the vacancies quickly. Mansour has previously spoken at events held at UNRWA schools in order to express solidarity with Palestinian terrorists.<sup>127</sup>

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<sup>124</sup> *Id.* at 27.

<sup>125</sup> *Id.* at 23.

<sup>126</sup> *Id.* at 25.

<sup>127</sup> *Id.* at 8.

167. In May 2020, **Mr. Cordone** met with Mr. Faisal of the DFLP, as well as with Mr. Abd Al-Hadi of Hamas, in Lebanon to discuss more cash assistance for Palestinians in Lebanon.<sup>128</sup>

168. In October 2020, **Mr. Schmale**, then-UNRWA Gaza Director, met with DFLP leader Mahmoud Khalaf and his colleagues in the Joint Refugee Committee to discuss UNRWA's activities in Gaza, placing various demands on UNRWA regarding employee hiring. The Joint Refugee Committee is a consortium of local leaders, led by the DFLP, that strongly advocate, *inter alia*, against UNRWA's neutrality policies and push back against any disciplinary action taken on this basis.<sup>129</sup>

169. That same month, **Mr. Schmale** met again with DFLP leaders and his colleagues in the Joint Refugee Committee to discuss UNRWA's activities in Gaza, hoping to resolve "the problem of forcibly dismissed employees" at UNRWA.<sup>130</sup>

170. In March 2021, then-UN Special Coordinator for Lebanon **Mr. Lazzarini** met with leaders of the "Palestinian Joint Action Committee" at Ein el-Hilweh camp in Lebanon. The Palestinian Joint Action Committee is a coalition of armed Palestinian groups in Lebanon, including several FTOs—Hamas, PLO, PIJ, and PFLP.<sup>131</sup>

171. In April 2021, **Muhammad Abu Attia**, UNRWA Tyre Director, hosted the leadership of the Palestinian Forces Alliance in his office in Lebanon, leadership which consisted of representatives from various armed Palestinian groups, including PIJ official Muhammad Abd al-Aal. In this meeting, Mr. Abu Attia agreed "to continue communication, consultation, cooperation and coordination" with the armed groups.<sup>132</sup>

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<sup>128</sup> *Id.* at 28.

<sup>129</sup> *Id.* at 36.

<sup>130</sup> *Id.* at 37.

<sup>131</sup> *Id.* at 9.

<sup>132</sup> *Id.* at 45.



172. In June 2021, then-UNRWA Deputy Commissioner-General **Leni Stenseth** visited Hamas leader (and mastermind of the October 7 massacre) Yahya Sinwar at his office in Gaza, where she personally thanked him “for his positivity and desire to continue cooperation in facilitating the agency’s work in the Gaza Strip.” The meeting ended with both parties—Hamas and UNRWA—emphasizing the need for “direct communication and dialogue” and “cooperation.”<sup>133</sup> Her visit was part of a larger UNRWA apology tour to get back in the good graces of Hamas after then-UNRWA Gaza Director Matthias Schmale had referred to Israeli strikes in Gaza as “precise.” Ms. Stenseth removed Mr. Schmale from his post and referred to his interview as “indefensible.”

173. In November 2021, **Mr. Abu Attia** hosted a variety of terrorist groups in his office yet again. This time, he included not only representatives from PIJ, but also from Hamas and PLF.<sup>134</sup>

174. In January 2022, **Mr. Abu Attia** met with PIJ leader Jihad Muhammad in order to reemphasize “the need for cooperation between local forces and UNRWA.”<sup>135</sup>

175. In February 2022, then-UNRWA Lebanon Director **Claudio Cordone** met with a collation of terrorist groups, including Hamas and Palestinian Islamic Jihad, at the Ain Al-Hilweh camp. Al-Hadi was also present at that meeting. The purpose of the meeting was to reassure the factions that the Lebanese government would “do its utmost to enhance cooperation and coordination with the Palestinian forces,” otherwise known as terrorist organizations. The “most important stop on the tour” for Mr. Cordone was a meeting in Martyr Naji al-Ali Hall with members of the Palestinian Joint Action Committee. As a reminder, the Palestinian Joint Action

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<sup>133</sup> *Id.* at 42.

<sup>134</sup> *Id.* at 46.

<sup>135</sup> *Id.* at 47.

Committee is a coalition of armed Palestinian groups in Lebanon, including several FTOs— Hamas, PLO, PIJ, and PFLP.<sup>136</sup>

176. In June 2022, then-UN Special Coordinator for Lebanon **Mr. Lazzarini** and UNRWA Gaza Director **Thomas White** met with the Joint Refugee Committee, which included Basil Al-Wahidi, a senior member of the PFLP, an FTO that participated in the October 7 Terror Attacks alongside Hamas. The meeting was organized by Mahmoud Khalaf, a senior member of the DFLP. Mr. Al-Wahidi is Mr. Khalaf’s deputy on the Joint Refugee Committee.<sup>137</sup>

177. In August 2022, **Mr. White** met with the Joint Refugee Committee, headed by the DFLP, where the Committee reiterated that UNRWA needed to hire more staff.<sup>138</sup>

178. In September 2022, **Munir Manna**, the Acting UNRWA Director-General in Lebanon, met with Hamas Political Relations Office Khaled Zuaiter in Lebanon.<sup>139</sup>

179. In December 2022, **Mr. White** met again with the Joint Refugee Committee, where “the importance of joint work and cooperation between UNRWA and the Joint Refugee Committee was emphasized.”<sup>140</sup>

180. **Mr. Lazzarini** met with the Joint Refugee Committee again in February 2023 and July 2023, where either Mr. Khalaf, Mr. Al-Wahidi, or both were present.<sup>141</sup>

181. In February 2023, **Mr. Manna** received an award from Hamas’s Lebanon Chief and UNRWA school principal, as well as the head of UNRWA Lebanon Teachers Union, Faithi-Al-Sharif.<sup>142</sup>

182. In September 2023, **Dorothee Klaus**, UNRWA Director-General in Lebanon, met

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<sup>136</sup> *Id.* at 29.

<sup>137</sup> *Id.* at 18, 15.

<sup>138</sup> *Id.* at 40.

<sup>139</sup> *Id.* at 41.

<sup>140</sup> *Id.* at 40.

<sup>141</sup> *Id.* at 17.

<sup>142</sup> *Id.* at 41.

with DFLP leaders, who pressured UNRWA to increase its funding of Palestinians in Lebanon. Present at the meeting was Arkan Badr, an UNRWA graduate and now DFLP leader who publicly calls for “dismantling the Zionist movement” and believes “all of historical Palestine belongs to the Palestinian people.”<sup>143</sup>

183. In November 2023, **Ms. Klaus** met with Fathi Al-Sharif, the head of Hamas in Lebanon, where Al-Sharif declared his support for the “resistance” in front of Klaus and a cheering crowd.<sup>144</sup>

184. The following month, **Ms. Klaus** met again with the same DFLP delegation from September in Lebanon.<sup>145</sup>

185. In December 2023, just two months after the October 7 Terror Attacks, UNRWA Commissioner-General **Mr. Lazzarini** met in Lebanon with the Palestinian Forces Alliances, which consisted of representatives from various armed Palestinian groups, including Hamas. Khaled Zuaiter, a local Hamas leader in Lebanon and Hamas political relations officer, was there and spoke with Lazzarini.<sup>146</sup>

186. In September 2024, **Ms. Klaus** met again with DFLP leaders in Lebanon, where they pushed for more cash assistance in Lebanon and rejected the concept of biometric verification for beneficiaries of cash assistance.<sup>147</sup>

***J. Well before October 7, Elected Officials in the United States Publicly Condemned UNRWA for Its Close Ties to Hamas.***

187. For years, elected officials in the United States have publicly acknowledged and denounced UNRWA’s close affiliation with and control by Hamas.

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<sup>143</sup> *Id.* at 30.

<sup>144</sup> *Id.* at 31.

<sup>145</sup> *Id.* at 31.

<sup>146</sup> *Id.* at 14.

<sup>147</sup> *Id.* at 32.

188. In April 2021, Senator Jim Risch of Idaho and twenty other U.S. Senators sent a letter to Secretary of State Antony Blinken calling for the defunding of UNRWA until the organization was reformed.<sup>148</sup> The letter noted that “[o]ver the years [UNRWA] has employed individuals affiliated with Hamas, a U.S. designated terrorist organization. UNRWA schools have been used to store Hamas weapons.”<sup>149</sup>

189. Three months later, Senator Jim Risch of Idaho and twelve other U.S. Senators introduced the United Nations Relief and Works Agency Accountability and Transparency Act, which “outline[d] a comprehensive approach to cease U.S. contributions to the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), a successor entity, or to the U.N. regular budget for the support of UNRWA unless the Secretary of State certifies every 180 days to Congress that UNRWA meets strict accountability and transparency criteria.”<sup>150</sup>

190. Senator Risch further observed that “the organization has employed individuals affiliated with Hamas, a U.S. designated foreign terrorist organization (FTO), and its schools have been used to promote anti-Semitism and store Hamas weapons.”<sup>151</sup>

191. In 2021, Senator Tillis of North Carolina stated, “U.S. tax dollars should not go to any U.N. agency supporting individuals associated with Hamas or anti-Semitism. I am proud to cosponsor this legislation that would cease U.S. support to UNRWA unless they show additional transparency.”<sup>152</sup>

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<sup>148</sup> Press Release, Senate Foreign Relations Committee, Risch Leads 20 Colleagues in Urging Administration to Cease Assistance to UNRWA Until Reforms are Secured (Apr. 22, 2021), <https://www.foreign.senate.gov/press/rep/release/risch-leads-20-colleagues-in-urging-administration-to-cease-assistance-to-unrwa-until-reforms-are-secured>.

<sup>149</sup> *Id.*

<sup>150</sup> Press Release, Senate Foreign Relations Committee, Risch Leads 12 Colleagues in Introducing UNRWA Accountability and Transparency Act (July 27, 2021), <https://www.foreign.senate.gov/press/rep/release/risch-leads-12-colleagues-in-introducing-unrwa-accountability-and-transparency-act>.

<sup>151</sup> *Id.*

<sup>152</sup> *Id.*

192. In 2021, Senator Crapo of Idaho denounced UNRWA, stating, “The UNRWA now practices activities far beyond its intended scope, including engaging in antagonistic behaviors toward Israel. American taxpayers should not have to continue footing the bill to fund an agency linked to foreign terrorist groups or using and promoting anti-Semitic material.”<sup>153</sup>

193. Senator Daines of Montana also opined, “We must ensure taxpayer dollars are not being funneled into programs that support terrorist organizations and promote antisemitism.”<sup>154</sup>

194. Senator Young of Indiana highlighted UNRWA’s employment of Hamas terrorists: “Instead of just caring for refugees, UNRWA supports – and even employs – members of the terrorist organization Hamas, funds anti-Semitic and radical Islamic instruction, and undermines efforts to achieve peace between Israel and the Palestinians.”<sup>155</sup>

195. Senator Collins of Maine also remarked, “[UNRWA] has a record of employing individuals affiliated with Hamas, a U.S. designated terrorist organization, as well as promoting anti-Semitism.”<sup>156</sup>

196. Senator Rick Scott of Florida noted, “Just a few months ago, we saw Hamas terrorists attack our great ally, Israel. American taxpayer dollars should never be used to fund terrorist organizations like Hamas through the United Nations Relief and Works Agency. It’s common sense.”<sup>157</sup>

197. Senator Blackburn of Tennessee also highlighted UNRWA’s direct ties to Hamas: “While the UNRWA was established nearly 70 years ago with the intent of assisting refugees, it has evolved into a cash funnel for Hamas and a mouthpiece for anti-Semitism.”<sup>158</sup>

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<sup>153</sup> *Id.*

<sup>154</sup> *Id.*

<sup>155</sup> *Id.*

<sup>156</sup> *Id.*

<sup>157</sup> *Id.*

<sup>158</sup> *Id.*

198. Both Hamas and the PLO implicitly have acknowledged their reliance on UNRWA to operate, expressing outrage that the United States had halted funding to UNRWA in 2018. If UNRWA were indeed a group operating in opposition to Hamas (as opposed to as an organ of Hamas), a decline in UNRWA's influence would be welcome, for it would allow terrorist groups in Gaza to fill the void.<sup>159</sup>

***K. Defendant UNRWA Was Directly Involved in the October 7 Hamas Terrorist Attacks.***

199. Awareness of Defendant UNRWA's support of Hamas did nothing to deter UNRWA USA's support of UNRWA.

200. Along with providing Hamas with decades of funding and support, Defendants UNRWA and UNRWA USA provided direct support for Hamas on October 7, 2023, in the form of financing and personnel, including actual, direct participation in the atrocities of October 7, and continuing participation in the ongoing terrorism and the keeping of hostages since.

201. In January 2024, *The New York Times* detailed a report on the involvement of UNRWA employees in the October 7 Hamas terrorists attacks.<sup>160</sup> The report, based on a review of Israeli intelligence reports, initially identified at least twelve UNRWA employees that directly participated in the attacks. "[S]even of the accused were also said to be teachers at UNRWA schools, instructing students in subjects like math and Arabic" and "[t]wo others worked at the schools in other capacities."<sup>161</sup> That number has since increased to at least 18 UNRWA employees believed to have participated in the October 7 Terror Attacks.<sup>162</sup>

202. Some of the UNRWA employees believed to be involved in the October 7 Terror

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<sup>159</sup> *Wishing away Palestinian refugees: End of US' UNRWA aid explained*, Al Jazeera (Sept. 2, 2018), <https://www.aljazeera.com/news/2018/9/2/wishing-away-palestinian-refugees-end-of-us-unrwa-aid-explained>.

<sup>160</sup> Ronen Bergman & Patrick Kingsley, *Details Emerge on U.N. Workers Accused of Aiding Hamas Raid*, N.Y. TIMES (Jan. 28, 2024), <https://www.nytimes.com/2024/01/28/world/middleeast/gaza-unrwa-hamas-israel.html>.

<sup>161</sup> *Id.*

<sup>162</sup> THE CONNECTION BETWEEN UNRWA AND HAMAS IN GAZA, *supra* note 38, at 54.

Attacks include, but are not limited to, the following:<sup>163</sup>

- a. UNRWA school counselor Mousa Subhi Musa El-Qidra served as a deputy company commander in Hamas's Khan Younis Brigade. El-Qidra assisted in training terrorists for Hamas in preparation for the October 7 Terror Attacks. On October 7, 2023, El-Qidra and his son kidnapped an Israeli woman. His ID card was found in Mohammad Sinwar's assistance office. El-Qidra had been an UNRWA employee since 2005.
- b. Ala Abd al-Hamid Qassem Jouha was employed as an Arabic Religion teacher at an UNRWA elementary school, but he also was a company commander in Hamas's Nuseirat Battalion that invaded Kibbutz Be'eri, slaughtering 10% of the kibbutz's residents. 80% of the recovered victims showed signs of unspeakable torture, including rape and other acts of extreme violence. One emergency worker reported to *The New Yorker* the sights he had seen at Kibbutz Be'eri:

[T]he body of a pregnant woman whose belly had been cut open, her infant still inside; children burned alive; the bodies of a couple who had been handcuffed to each other and tortured in front of their children, with one of the man's eyes gouged out.<sup>164</sup>

As stated by *The New York Times*, "No Israeli town suffered more bloodshed on Oct. 7 than the village of Be'eri."

- c. UNRWA social worker Faisal Ali Mussalem al-Naami also was a terrorist in Hamas's Nuseirat Battalion that invaded Kibbutz Be'eri. Al-Naami kidnapped the corpse of Yonatan Samerano, a twenty-one-year-old Israeli civilian who had fled the Nova Music Festival and sought refuge at Be'eri before it too was invaded by Hamas. Al-Naami assisted in coordinating transportation and weapons supply for the October 7 Terror Attacks. Al-Naami had been an UNRWA employee since 2006.<sup>165</sup>
- d. UNRWA elementary school teacher Ibrahim Atiya Mohammad Abu Ghafra, who also served in Hamas's Nuseirat Battalion, took part in the mass murder at Kibbutz Reim. Abu Ghafra had been an UNRWA employee since 2017.<sup>166</sup>
- e. Three UNRWA employees received an instruction from Hamas to report to a specific location prior to the October 7 Terror Attacks: UNRWA school attendant Shadi Mohammad Jamal Razak Darabiah (squadron commander in Hamas's East Jabalia Battalion),<sup>167</sup> UNRWA Arabic teacher Mohammad El Ghafari (squad commander in

<sup>163</sup> *Id.* at 55.

<sup>164</sup> Ruth Margalit, *The Devastation of Be'eri*, NEW YORKER (Oct. 19, 2023), <https://www.newyorker.com/news/dispatch/the-devastation-of-beeri>.

<sup>165</sup> THE CONNECTION BETWEEN UNRWA AND HAMAS IN GAZA, *supra* note 38, at 61–63.

<sup>166</sup> *Id.* at 64–65.

<sup>167</sup> *New report confirms 3 UNRWA workers took part in Oct 7 attack*, i24 NEWS (Mar. 7, 2024), <https://www.i24news.tv/en/news/israel-at-war/1709796476-new-report-confirms-3-unrwa-workers-took-part-in-oct-7-attack>.

the Hamas's Nuseirat Battalion),<sup>168</sup> and UNRWA teacher Ali Isa Hamuda Matar (Hamas platoon commander).<sup>169</sup> Notably, Matar had been employed at UNRWA since 2000.

- f. UNRWA Deputy School Principal at the Nuseirat Prep B Boys School, Abd Al-Rahman Atiya Salem Abu Awad, also served as a platoon commander in Hamas's Nuseirat Battalion. He partook in the October 7 Terror Attacks.<sup>170</sup>
- g. Another UNRWA employee established an operations room for the PIJ on October 8, the day after the attack.<sup>171</sup>
- h. UNRWA School Counselor Baker Mahmoud Abdallah Darwish also served as an operative in Hamas's intelligence unit. He invaded Israel on October 7, 2023. He had been registered as an UNRWA staff member since March 2005.<sup>172</sup>
- i. UNRWA clerk Mohammad Nasser al-Din Mohammad Abu Naama, also a member of Hamas, invaded Israel on October 7, 2023.<sup>173</sup>
- j. UNRWA health center clerk Ghassan Nabil Mohammad Sh'hadda El Jabari (an operative in Hamas's al-Furkan Battalion) appeared at an Israeli hospital with a gunshot wound, presumably after invading Israel on October 7, 2023.<sup>174</sup>
- k. UNRWA math teacher and Rami Mohammad Ramadan Sabbah performed logistical operations for Hamas in its Dir el Balah Battalion. Sabbah was responsible for receiving hostages on October 7, 2023, and holding them captive.<sup>175</sup>
- l. UNRWA elementary school teacher Yusef Zidan Salimam Al-Khuajri (terrorist in Hamas's Central Camps Brigades) invaded Israel on October 7, 2023, and reveled to his friends via phone that he captured a "sabaya," a term used by Islamic state jihadists to refer to a sex slave—a female hostage. "We have female hostages, I captured one!"

<sup>168</sup> @COGAT, X (formerly Twitter) (Feb. 25, 2024, 6:19 AM), <https://x.com/cogatonline/status/1761712446631198753>.

<sup>169</sup> UNRWA Staff Involved: Examples, Gov't of Israel (last visited Aug. 22, 2025), <https://govextra.gov.il/unrwa/unrwa/unrwa-staff-involved-examples/>.

<sup>170</sup> Senior UNRWA educators in Gaza involved in terrorism, GOV'T OF ISRAEL (last visited Aug. 22, 2025), <https://govextra.gov.il/mda/unrwa-educators/unrwa-educators-and-their-involvement-in-terrorism/>.

<sup>171</sup> Carrie Keller-Lynn & David Luhnnow, *Intelligence Reveals Details of U.N. Agency Staff's Links to Oct. 7 Attack*, WALL ST. J. (updated Jan. 29, 2024), [https://www.wsj.com/world/middle-east/at-least-12-u-n-agency-employees-involved-in-oct-7-attacks-intelligence-reports-say-a7de8f36?gaa\\_at=eafs&gaa\\_n=ASWzDAgS7I3usxZpgu4kbdZPkQH1-Yt8mXKVmTyn0MtDPQCgEI5-xo44vPeMOs3DSAY%3D&gaa\\_ts=68a69016&gaa\\_sig=uFmMzyE8jDX1ITP\\_zsc5i0POBr7dc2C4f7TNa7L53P7HwVlMX6C4L9092pi0f7vSD8ZVRamyF2If3OW0OfPhmQ%3D%3D](https://www.wsj.com/world/middle-east/at-least-12-u-n-agency-employees-involved-in-oct-7-attacks-intelligence-reports-say-a7de8f36?gaa_at=eafs&gaa_n=ASWzDAgS7I3usxZpgu4kbdZPkQH1-Yt8mXKVmTyn0MtDPQCgEI5-xo44vPeMOs3DSAY%3D&gaa_ts=68a69016&gaa_sig=uFmMzyE8jDX1ITP_zsc5i0POBr7dc2C4f7TNa7L53P7HwVlMX6C4L9092pi0f7vSD8ZVRamyF2If3OW0OfPhmQ%3D%3D).

<sup>172</sup> UNRWA Staff Involved: Examples, *supra* note 168.

<sup>173</sup> UNRWA In Numbers, Jerusalem Institute of Justice (last visited Aug. 22, 2025), <https://jij.org/advocacy-materials/unrwa-in-numbers/>.

<sup>174</sup> *Id.*

<sup>175</sup> THE CONNECTION BETWEEN UNRWA AND HAMAS IN GAZA, *supra* note 38, at 58-59.



the UNRWA teacher jubilated to two friends.<sup>176</sup>

- m. Mamdouh Hussein Ahmad al-Qak, an UNRWA elementary school teacher at Shouka Prep Bosys School in Rafah, also served as an operative in Palestinian Islamic Jihad's Rafah Brigades. Al-Qak took part in the October 7 Terror Attacks and was revealed speaking on the phone as follows: "I'm inside, I'm inside with the Jews!"

203. UNRWA workers also held Israeli civilians hostage. In early February 2024, it emerged that at least two UNRWA teachers separately held hostage Israeli civilians abducted on October 7, 2023, in their homes, while UNRWA—and UNRWA USA—continued to pay their salaries.<sup>177</sup> Another UNRWA social worker kidnapped the body of an Israeli civilian from Kibbutz Be'eri, bringing his body back to Gaza in a van.

204. Upon release in January 2025, British-Israeli hostage Emily Damari revealed that she had been held hostage in several UNRWA facilities during her time in captivity, including one in which she was denied medical care for her gunshot wounds.

205. Following these reports, the United Nations—essentially acknowledging UNRWA employee involvement in the October 7 Terror Attacks—fired nine employees. Eight countries, including the United States, subsequently suspended aid to UNRWA.<sup>178</sup>

206. The U.N. Secretary General António Guterres stated he was “horrificed by these accusations.”<sup>179</sup>

207. Swiftly, the U.S. Department of State announced that it “ha[d] temporarily paused additional funding for UNRWA” in response to the “extremely troubling . . . allegations that twelve UNRWA employees may have been involved in the October 7 Hamas terrorist attack on Israel.”<sup>180</sup>

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<sup>176</sup> *New report confirms 3 UNRWA workers took part in Oct 7 attack*, *supra* note 166.

<sup>177</sup> Andrew Tobin, *UNRWA Teachers Held Israeli Boy, Elderly Woman Hostage for Hamas*, WASH. FREE BEACON (Feb. 2, 2024) <https://freebeacon.com/national-security/unrwa-teachers-held-israeli-boy-elderly-woman-hostage-for-hamas>.

<sup>178</sup> *Id.*

<sup>179</sup> *Id.*

<sup>180</sup> *Statement on UNRWA Allegations*, U.S. DEP'T OF STATE, OFFICE OF THE SPOKESPERSON (Jan. 26, 2024), <https://www.state.gov/statement-on-unrwa-allegations>.

The Department of State emphasized that “[t]here must be complete accountability for anyone who participated in the heinous attacks of October 7.”<sup>181</sup>

208. On January 31, 2024, a group of twenty-one U.S. Senators sent a letter to Senate Majority Leader Chuck Schumer and Minority Leader Mitch McConnell requesting that the United States cease all contributions to UNRWA in response to the report. The letter stated that UNRWA’s involvement in the terrorist attacks was “emblematic of an organization where no investigation or subsequent corrective measures will ever be enough to cure the rot that is so clearly endemic to its mission.”<sup>182</sup>

209. The January 31, 2024, letter further noted, “For years, we have seen documented evidence of the corruption, antisemitism, and support for terrorism that exists inside this organization. As we learned last week, UNRWA not only employs Hamas members, but rather Hamas fighters whose actions on October 7 resulted in the rape, kidnapping, torture, and murder of innocent civilians,” including nearly three dozen Americans.<sup>183</sup>

210. On February 13, 2024, the U.S. Senate passed a bill that blocked all U.S. funding to UNRWA. The bill passed with overwhelming bipartisanship support, with seventy U.S. Senators voting in favor of it.<sup>184</sup>

211. Interestingly, during this time, UNRWA USA continued to fund UNRWA, despite

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<sup>181</sup> *Id.*

<sup>182</sup> Letter from Pete Ricketts *et al.* to Chuck Schumer and Mitch McConnell (Jan. 31, 2024), <https://senatorkevincramer.app.box.com/s/5rh35mo9ip1trv13kx7a5xp2pk4nv0e5>.

<sup>183</sup> Press Release, Kevin Cramer, Senators Stress the Need for U.S. to Permanently Stop Contributions to the UNRWA (Feb. 2, 2024), <https://www.cramer.senate.gov/news/press-releases/senators-stress-the-need-for-us-to-permanently-stop-contributions-to-the-unrwa>.

<sup>184</sup> Alexander Bolton, *Senate package doesn’t fund UN agency after allegations tied to Oct. 7 attacks*, THE HILL (Feb. 4, 2024), <https://thehill.com/homenews/senate/4448092-senate-package-doesnt-fund-un-agency-after-allegations-tied-to-oct-7-attacks>; see also Scott Wong, Frank Thorp V & Kate Santaliz, *Senate passes aid package for Ukraine and Israel, but its future is uncertain in the House*, NBC NEWS (Feb. 13, 2024), <https://www.nbcnews.com/politics/congress/senate-passes-aid-package-ukraine-israel-future-uncertain-house-rcna138502>.

the United States having halted funding.

212. The United States was joined by at least seventeen other countries and entities that also cut funding to UNRWA, including Germany, the European Union, Sweden, Japan, France, Switzerland, Canada, the United Kingdom, the Netherlands, Australia, Italy, Austria, Finland, New Zealand, Iceland, Romania, and Estonia.<sup>185</sup>

213. *The Washington Post* also released CCTV footage of an UNRWA social worker driving toward an open gate to Kibbutz Be'eri on October 7, 2023. In the footage, the UNRWA employee picks up an apparently deceased Israeli body off the street, loads the body into his SUV, and drives off.<sup>186</sup>

214. On February 16, 2024, Israeli Defense Minister Yoav Gallant announced an upwardly revised number regarding UNRWA's physical participation in the October 7 attacks, stating "that over 30 UNRWA workers participated in the massacre, including the taking of hostages."<sup>187</sup> Minister Gallant asserted that "12 percent of UNRWA's 13,000 workers are affiliated with Hamas and Palestinian Islamic Jihad, a smaller Islamist group in the Gaza Strip."<sup>188</sup>

215. The Israeli army also reported that Hamas operated a tunnel system under the UNRWA headquarters in Gaza, releasing a video showing the tunnel hideout of Hamas leader Yahya Sinwar in southern Gaza.<sup>189</sup> The tunnel hideout was stocked with UNRWA packages and supplies.<sup>190</sup>

216. Hamas also operated a subterranean data center beneath the UNRWA's Gaza

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<sup>185</sup> *UPDATED: List of Countries Suspending UNRWA Funding*, *supra* note 38.

<sup>186</sup> Chris Dehghanpoor, Miriam Berger, Sarah Cahlan, Shane Harris & Joyce Sohyun Lee, *Video is said to show U.N. relief worker taking body of Israeli shot on Oct. 7*, WASH. POST (Feb. 16, 2024), <https://www.washingtonpost.com/investigations/2024/02/16/unrwa-video-oct-7-israel/>.

<sup>187</sup> *Id.*

<sup>188</sup> *Id.*

<sup>189</sup> *Id.*

<sup>190</sup> *Id.*

headquarters that was connected directly to UNRWA's electricity supply.<sup>191</sup> As in the instance of UNRWA schools shielding terror tunnels, UNRWA miraculously did not notice a massive tunnel several hundreds of meters long being constructed beneath its headquarters or a jump in its electrical usage once Hamas's large data center became operable.

217. But even after UNRWA was condemned and defunded, UNRWA USA doubled down on its financing of UNRWA's terrorist activities. At all relevant times, Defendant has conspired with UNRWA, Hamas, and others to finance, promote, foster, support, endorse, approve, and engage in the terrorist activities and agenda of Hamas and other foreign terrorist organizations and their members.

***L. At All Relevant Times, UNRWA USA Knew about UNRWA's Intertwinement with Hamas by Virtue of its Role as UNRWA's Fundraising Arm.***

218. At all relevant times, UNRWA USA has been aware of UNRWA's involvement with Hamas, as detailed in the aforementioned articles and cited reports.

219. UNRWA USA exists solely for the purpose of fundraising for UNRWA, shares a logo with UNRWA, bears the name "UNRWA," and works in close coordination with UNRWA to promote UNRWA's programs in the United States.

220. One important resource for UNRWA USA to understand the inner workings of UNRWA would be UNRWA USA's former Board Member, Karen AbuZayd, who served on UNRWA USA's board from at least 2017 until or about 2024.

221. In 2005, Ms. AbuZayd was appointed UNRWA Commissioner-General to succeed outgoing Commissioner-General Peter Hansen. One year prior to Ms. AbuZayd's promotion,

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<sup>191</sup> Ronny Reyes, *Israel uncovers Hamas tunnels under UNRWA headquarters in Gaza, claims terrorists siphoned electricity from the site*, N.Y. POST (Feb. 11, 2024), <https://nypost.com/2024/02/11/news/israel-uncovers-tunnels-beneath-unrw-headquarters-in-gaza/>; <https://govextra.gov.il/media/qbep4ejj/the-connection-between-unrwa-and-hamas-280425.pdf>.

Hansen stated, as asserted prior, “Oh, I am sure that there are Hamas members on the UNRWA payroll, and I don't see that as a crime.” At that time, Ms. AbuZayd was Mr. Hansen’s Deputy Commissioner-General; upon information and belief, she was aware of Hansen’s comments and the pervasiveness of Hamas’s influence in UNRWA.

222. In April 2006, Ms. AbuZayd also stated that she commonly met with Hamas and would continue to do so: “It doesn’t make sense to reduce contacts when you’ve been asked to increase your activities,” she said, stressing that UNRWA had “‘no intention of changing’ its operations.” The following year, Hamas assumed complete control of the Gaza Strip.

223. Ms. AbuZayd served as UNRWA’s Commissioner-General from 2005 to 2010, and prior to that, as UNRWA’s Deputy Commissioner-General for five years. Ms. AbuZayd served as UNRWA’s Commissioner-General during the time period at which Hamas came to power, leaning on UNRWA schools as a form of outreach to the Gazan community.

224. UNRWA USA has a *duty* to have enhanced knowledge of UNRWA’s operations. As an American 501(c)(3) engaged in awarding foreign grants, UNRWA USA has a responsibility (1) to conduct thorough due diligence on its foreign grantees to ensure funds are used for legitimate, compliant purposes; (2) to investigate any potential misuse by a grantee; and (3) to take appropriate and responsive action, such as withholding further funds or terminating the grant, until the matter is resolved. In instances where potential terrorism activity is concerned, UNRWA USA has a duty to report the matter to the relevant authorities. These responsibilities are a function of IRS Revenue Ruling 63-252, IRS Publication 4221PC, and Treasury anti-terrorism guidance.

225. All the public information in this Complaint regarding Defendant UNRWA’s intertwinement and partnership with Hamas—in particular, all the material preceding the October 7 Terror Attacks—was also already publicly available to Defendant UNRWA USA. When

combined with UNRWA USA's constant contact with members of UNRWA—as well as having a former UNRWA General-Commissioner on its board for many years—it would have been impossible for UNRWA USA to *not* know of Hamas and UNRWA's close intertwinement.

226. UNRWA USA's own Executive Director has acknowledged public reporting on UNRWA's intertwinement with Hamas. For example, on January 11, 2024, UNRWA USA Communications Director Diala Ghneim hosted an Instagram live discussion with UNRWA USA Executive Director Mara Kronenfeld on the official UNRWA USA Instagram page. During this Instagram live feed, Ms. Ghneim and Ms. Kronenfeld discussed the UN Watch report “UNRWA’S TERRORGRAM.” Ms. Kronenfeld said she was aware of this report and UN Watch's previous reports.<sup>192</sup>

227. As a grantor of UNRWA, UNRWA USA cannot engage in willful blindness as to the degree of infiltration by Hamas.

228. UNRWA USA was fully aware that UNRWA employees supported, engaged in, and celebrated the terrorist attacks on October 7, but UNRWA USA continued to fund UNRWA and its terrorist activities before, during, and after the October 7 Terror Attacks.

229. It is telling that even with the cascade of information regarding UNRWA's involvement in the October 7 Terror Attacks, UNRWA USA has not flinched in its support, save one month in early 2024. Indeed, UNRWA USA's behavior following the October 7 Terror Attacks suggests that the close intertwinement between UNRWA and various FTOs, including Hamas, is not a problem for the organization.

230. Despite the plethora of information released following the October 7 Terror Attacks that detailed UNRWA's involvement in the attacks and Hamas's infiltration of the organization,

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<sup>192</sup> UNRWA USA(@unrwausa), Instagram, <https://www.instagram.com/unrwausa/tv/C1-L7kvgYB6>.

UNRWA USA paused funding to UNRWA for a mere *thirty days*—from March 2024 to April 2024. Then, as *more* information on Hamas’s control over the organization emerged, UNRWA USA’s support of UNRWA remained more steadfast.

231. In contrast, the United States has cut funding to UNRWA numerous times for its ties to Hamas under both Democratic and Republican administrations, including in both 2018 and early 2024. Meanwhile, UNRWA has suspended funding for merely one month in total. Even now, at the time of filing this Amended Complaint, the United States refuses to fund UNRWA due to its relationship with Hamas, while UNRWA USA continues to transfer funds to UNRWA.

232. The United States has been aware of UNRWA’s Hamas connections for decades. In 2003 a House International Relations Committee hearing included testimony that Hamas-affiliated individuals were employed by UNRWA, and that UNRWA failed to prevent militants from operating in refugee camps.

233. In 2004, then–Deputy Secretary of State Richard Armitage confirmed the U.S. was “aware of Hamas activities in and around UNRWA facilities” and flagged this as a serious monitoring concern.

234. In 2009, U.S. officials acknowledged receiving complaints Hamas stored weapons in or near UNRWA facilities reached Washington and called for tighter oversight.

235. In 2014, members of both the U.S. House of Representatives and U.S. Senate openly accused UNRWA of “aiding Hamas by allowing its facilities to be used for military purposes” and called for cutting U.S. funding.

236. In 2018, the United States cut all funding to UNRWA, citing its “links to terrorism.” The United States has periodically continued to fund UNRWA for political reasons—even though they are fully aware of UNRWA’s Hamas connections—because the United States is subject to

different rules than a charity operating in the United States and an international organization with substantial contacts and operations in the United States.

237. Following allegations of UNRWA employees partaking in the October 7 Terror Attacks, on January 29, 2024, UNRWA USA issued an official statement acknowledging “the recent allegations against twelve UNRWA staff members.” Notwithstanding the acknowledged link between UNRWA and Hamas, UNRWA USA—in the very same official statement—restated its commitment to sending funding to UNRWA:

For our part, UNRWA USA will continue its tireless efforts to help Palestine refugees in desperate need in Gaza. The need for international aid is more urgent than ever, and UNRWA has a critical role to play in providing it. Rather than pulling back on aid to UNRWA, redoubling aid efforts, to ensure UNRWA can continue and increase its vital humanitarian support in Gaza, is more urgent than ever.<sup>193</sup>

238. With mounting public pressure due to the publicized Hamas-UNRWA ties, UNRWA USA announced on March 1, 2024, that it was temporarily halting funding to UNRWA and that it “supports the ongoing investigations of UNRWA by the United Nations Office of Internal Oversight Services (OIOS) and the independent review group.”<sup>194</sup> But in that same public statement, Defendant reaffirmed its commitment to funding terrorist activities again in the future: “[UNRWA USA] intends to resume financial support to UNRWA upon appropriate resolution of these investigations.”<sup>195</sup>

239. Any statements by UNRWA USA expressing horror at the intertwining of

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<sup>193</sup> Press Release, UNRWA USA, UNRWA USA Horrified by Allegations Against Some UNRWA Staff, Calls for Redoubled Efforts Amidst Catastrophic Humanitarian Crisis in Gaza to Aid Refugees (Jan. 29, 2024), <https://www.unrwausa.org/unrwa-usa-press-releases/unrwa-usa-stands-firm-in-its-commitment-to-palestine-refugees>.

<sup>194</sup> Press Release, UNRWA USA, UNRWA USA Stands Firm in its Commitment to Palestine Refugees (Mar. 1, 2024), <https://www.unrwausa.org/unrwa-usa-press-releases/unrwa-usa-stands-firm-in-its-commitment-to-palestine-refugees>.

<sup>195</sup> *Id.*



UNRWA and Hamas are insincere and intended to mislead the public. Information regarding the close relationship between Hamas and UNRWA, particularly in relation to the October 7 Terror Attacks, has only *increased* in the past year. And yet, UNRWA USA’s support for UNRWA—and in turn, Hamas—has been unwavering, further indicating that UNRWA USA’s supposed horror at the intertwinement of its funds recipient and Hamas is not actual horror (otherwise, the funding surely would have halted with the release of *more* damning information).

240. This support, when considered in light of the anti-Israel sentiments shared by UNRWA USA’s board members, makes sense. While every board member is absolutely entitled to his or her position, the work and sentiments of the board members are suggestive of the notion that knowledge of Hamas’s partnership and coordination with UNRWA would *not* be seen as problematic, insofar as many of UNRWA USA’s board members are opposed to the existence of the State of Israel.

241. One UNRWA USA board member, Tasneem Manjra, designs publication materials for the Council on American-Islamic Relations (“CAIR”), an organization that was an unindicted co-conspirator in the Holy Land Foundation case, the largest anti-terrorism financing prosecution in the United States in which several American charities were prosecuted for funneling millions to Hamas.<sup>196</sup> CAIR’s leader, Nihad Awad declared himself “happy” on October 7, 2023, “to see people breaking the siege.”

242. Another UNRWA USA board member, Nadia Saah, concurrently serves on the board of the Adalah Justice Project, an anti-Israel non-government organization that became one of the subjects of a Congressional probe in May 2024 for bankrolling and supporting anti-Israel

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<sup>196</sup> Tasneem Manjra, *Publications*, FLIPSNACK, <https://www.flipsnack.com/7CA6A977C6F/> (last visited Aug. 21, 2025).

protests on college campuses in possible violation of anti-terrorism financing laws.<sup>197</sup> Ms. Saah has been regarded as a “dear friend and comrade” of the infamous Roger Waters, who is widely known in the United Kingdom for his antisemitic views.<sup>198</sup> In a May 2024 video, Waters advocated for the dismantling of Israel as a Jewish state, denied the Jewish connection to Israel, and called on Jews living in Israel to “go back to Eastern Europe, or the United States, or where you came from,” adding “Goodbye, Israel. It’s over.”

243. Another UNRWA USA board member’s social media<sup>199</sup> is littered with accusations of Acting U.S. Attorney of Nevada Sigal Chattah of being “Israel First,” promoting the antisemitic conspiracy that she refrained from prosecuting a pedophile because he was Israeli, even though Attorney Chattah does not have the authority to do so. It also contains retweets from the Hamas-state news network “Quds News Network” and other terrorist propaganda outlets and includes retweets of statements such as:

- What’s the most harmful thing society accepts as normal? Zionism and Zionists.
- every Zionist is far-right btw, not just Ben-Gvir, etc. the majority of Israelis supports the genocide. you can’t be anything but far-right if you believe settler-colonialism and ethnic cleansing of the native population is your God-given right. the distinction is pure propaganda
- Genocidal death cults do NOT have the right to exist. Normalize saying that.
- The Jewish Zionist soldiers killed his friends, colleagues, and family members around him one by one, publicly hunting him with impunity. May the entity and its genocidal rapist forces be wiped from the earth

<sup>197</sup> Adam Kredo, *Congress Launches Probe Into Groups Funding 'Pro-Hamas' Unrest on Campus*, WASH. FREE BEACON (May 14, 2024), <https://freebeacon.com/campus/congress-launches-probe-into-groups-funding-pro-hamas-unrest-on-campus/>.

<sup>198</sup> @rogerwaters, X (formerly TWITTER) (May 16, 2023, 7:54 AM), <https://x.com/rogerwaters/status/1658440786545987585>.

<sup>199</sup>

244. One former UNRWA USA board member, Lara Friedman, began accusing Israel of genocide six days after the October 7 Terror Attacks, claiming that the Israeli response to the October 7 Terror Attacks was “revenge for Palestinians daring to exist.” Ms. Friedman serves as the President of the Foundation for Middle East Peace (FMEP), an anti-Israel organization that has promoted the Boycott, Divest, and Sanctions movement designed to delegitimize the existence of the State of Israel. FMEP’s grantees include IfNotNow and Jewish Voice for Peace (“JVP”), both of which have been at the center of pro-Hamas, anti-Israel protests in the wake of the October 7 Terror Attacks, as well as several organizations with alleged ties to the PFLP, including Al-Haq.<sup>200</sup>

245. In furtherance of its conspiracy with UNRWA, Hamas, and others, and as further evidence of its knowingly and intentionally aiding and abetting Hamas and its terrorist activities, Defendant UNRWA USA has continued to send support to UNRWA and Hamas year after year, including the transfer of approximately \$3,000,000 in 2020<sup>201</sup>; \$5,000,000 in 2021<sup>202</sup>; \$3,800,000 in 2022; and \$22,300,000 in 2023.<sup>203</sup>

**FIRST CLAIM FOR RELIEF**  
**VIOLATION OF THE ANTI-TERRORISM ACT, 18 U.S.C. § 2333(a)**  
**(Primary Liability)**  
**UNRWA**

246. U.S. Plaintiffs repeat and reallege every allegation of the foregoing paragraphs as if fully set forth herein.

247. Under 18 U.S.C. § 2333(a), “any national of the United States injured in his or her

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<sup>200</sup> Foundation for Middle East Peace (FMEP), NGO MONITOR, [https://ngo-monitor.org/ngos/foundation\\_for\\_middle\\_east\\_peace\\_fmep/](https://ngo-monitor.org/ngos/foundation_for_middle_east_peace_fmep/) (last visited Aug. 22, 2025).

<sup>201</sup> UNRWA USA, Form 990 (2020), <https://www.unrwausa.org/s/UNRWA-USA-2020-Form-990.pdf>.

<sup>202</sup> UNRWA USA, Form 990 (2021), <https://www.unrwausa.org/s/UNRWA-USA-2021-Form-990.PDF>.

<sup>203</sup> UNRWA USA, Form 990 (2022), <https://www.unrwausa.org/s/UNRWA-2022-Form-990-Public-Disclosure-Copy.PDF>.

person, property, or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue.”

248. Section 2333(a) affords relief against principals who perpetrate acts of international terrorism against nationals of the United States.

249. U.S. Plaintiffs are nationals of the United States or the estates, survivors, and or heirs of such nationals, who were each injured in their person, property, and/or business as a result of the October 7 Terror Attacks.

250. Hamas, Palestine Islamic Jihad (“PIJ”), Popular Front for the Liberation of Palestine (“PFLP”), and PFLP-General Command (“PFLP-GC”) are all designated Foreign Terrorist Organizations (“FTOs”) under 8 U.S.C. § 1189. All of these organizations took part in the October 7 Terror Attacks against Israel that injured U.S. Plaintiffs.

251. The acts committed, planned, or authorized by Hamas, PIJ, PFLP, and PFLP-GC on October 7, 2023, appear to have been, and were intended to do the following: (a) intimidate or coerce the civilian populations of Israel, the United States, and other countries; (b) influence the policy of the Governments of Israel, the United States, and other countries by intimidation or coercion; or (c) affect the conduct of the Governments of Israel, the United States, and other countries by mass destruction, assassination, or kidnapping.

252. The acts committed, planned, or authorized by Hamas, PIJ, PFLP, and PFLP-GC on October 7, 2023—which included murder, rape, kidnapping, and other acts—would violate the criminal laws of the United States and many states, had they been committed in the United States.

253. The acts committed, planned, or authorized by Hamas, PIJ, PFLP, and PFLP-GC on October 7, 2023, occurred primarily outside the United States.

254. Therefore, the acts of violence committed by these organizations on October 7,

2023, were acts of international terrorism as defined by 18 U.S.C. § 2331(a), cross-referenced in 18 U.S.C. § 2333(a).

255. Defendant UNRWA employs members from these organizations, primarily from Hamas and PIJ, as well as coordinates with their leadership directly.

256. Defendant UNRWA also provides these organizations, primarily Hamas and PIJ, with essential infrastructure from which to launch their attacks and store their weaponry, as well as with energy to power Hamas's command center. Defendant UNRWA also grants Hamas access to its schools, and specifically its pupils, for the purposes of recruitment and propagandizing. Lastly, Defendant UNRWA provides Hamas with millions of dollars by facilitating Hamas's money laundering operation through strictly paying its Gaza employees in U.S. dollars. Without Defendant UNRWA, Hamas would be unable to finance its operations, recruit as many members, launch as many attacks, and hide its weapons and other equipment. Defendant UNRWA—and indirectly, Defendant UNRWA USA—are an integral part of Hamas's operating structure in Gaza, which includes carrying out the October 7 Terror Attacks.

257. As members of these terrorist organizations, an unknown number of employees—at least eighteen identified thus far—of Defendant UNRWA murdered, kidnapped, and otherwise terrorized Israeli men, women, and children on October 7, 2023.

258. Approximately 12% of UNRWA employees in Gaza are members of Hamas, PIJ, or another terrorist organization. Of the 546 principals and deputy-principals in UNRWA's education facilities in Gaza, at least 80 or 15% are members of a terrorist organization.<sup>204</sup>

259. Therefore, it is likely that an even greater number of UNRWA employees took part in the October 7 Terror Attacks that injured U.S. Plaintiffs, considering (1) Hamas had been,

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<sup>204</sup> <https://govextra.gov.il/media/qbep4ejj/the-connection-between-unrwa-and-hamas-280425.pdf>

though its own admission, planning the large-scale invasion for at least two years and (2) the sheer number of terrorist members on UNRWA's payroll.

260. Defendant UNRWA's willful, wrongful, and intentional conduct was a direct and proximate cause of U.S. Plaintiffs' harm. The harm suffered by U.S. Plaintiffs was a reasonably foreseeable consequence of hiring members of FTOs and refusing to conduct investigations into employees or substantive background checks free of input from Hamas.

261. At all relevant times, UNRWA knew that it was directly supporting Hamas and other terrorist organizations operating in Gaza through hiring members of FTOs; furnishing those FTOs with invaluable infrastructure and materials, such as buildings and energy; permitting those FTOs to hide their infrastructure beneath or near UNRWA facilities; partaking in a money laundering operation that enriches Hamas; and providing Hamas with access to the local population for the purposes of recruitment and propagandizing.

**SECOND CLAIM FOR RELIEF**  
**VIOLATION OF THE ANTI-TERRORISM ACT, 18 U.S.C. § 2333(d)**  
**(Aiding-and-Abetting Liability, Provision of Substantial Assistance Predicate)**  
**UNRWA USA; UNRWA**

262. U.S. Plaintiffs repeat and reallege every allegation of the foregoing paragraphs as if fully set forth herein.

263. Hamas, Palestine Islamic Jihad ("PIJ"), Popular Front for the Liberation of Palestine ("PFLP"), and PFLP-General Command ("PFLP-GC") are all designated Foreign Terrorist Organizations ("FTOs") under 8 U.S.C. § 1189 (collectively, "October 7 FTOs"). Though all of these organizations took part in the October 7 Terror Attacks against Israel that injured U.S. Plaintiffs, Hamas was the most active participant.

264. As designated FTOs under 8 U.S.C. § 1189, each committed, planned, or authorized activities that involved violence or acts dangerous to human life that are a violation of the criminal

laws of the United States, or that would be a criminal violation if committed within the jurisdiction of the United States, including inter alia the prohibition on killing, attempting to kill, causing serious bodily injury, or attempting to cause serious bodily injury to U.S. citizens as set forth in 18 U.S.C. § 2332.

265. These activities committed, planned, or authorized by the October 7 FTOs occurred entirely or primarily outside of the territorial jurisdiction of the United States.

266. These activities committed, planned, or authorized by the October 7 FTOs appear to have been, and were intended to do the following: (a) intimidate or coerce the civilian populations of Israel, the United States, and other countries; (b) influence the policy of the Governments of Israel, the United States, and other countries by intimidation or coercion; or (c) affect the conduct of the Governments of Israel, the United States, and other countries by mass destruction, assassination, or kidnapping.

267. These activities, therefore, constituted acts of international terrorism as defined in 18 U.S.C. § 2331(1), cross-referenced in 18 U.S.C. § 2333(d)(2).

268. Defendant UNRWA USA knowingly solicited funds for and provided substantial financial assistance to Defendant UNRWA, an organization that is openly and closely intertwined with Hamas—insofar as it hires members of Hamas, provides operational and financial support to Hamas, and permits Hamas to exercise control over its employees via the various staff unions in Gaza and Lebanon. Defendants thus aided and abetted Hamas in committing, planning, or authorizing acts of international terrorism, including the acts of international terrorism that injured U.S. Plaintiffs.

269. Defendant UNRWA USA was generally aware that Hamas had corrupted, coopted, and compromised Defendant UNRWA. Defendant UNRWA USA was fully aware or should have

been fully aware that its millions of dollars in donations to Defendant UNRWA were going to an organization that served as an organ of Hamas.

270. For approximately 19 years, Defendant UNRWA USA has raised funds to primarily support Defendant UNRWA's efforts in Gaza.

271. UNRWA USA is closely intertwined with UNRWA and directly funds UNRWA, which is also closely intertwined with Hamas. This intertwining is clear: Defendant UNRWA employs members of Hamas and other October 7 FTOs, as well as coordinates with their leadership directly. Defendant UNRWA also provides these organizations, primarily Hamas and PIJ, with essential infrastructure from which to launch their attacks and store their weaponry, as well as with energy to power Hamas's command center. Defendant UNRWA also grants Hamas access to its schools, and specifically its pupils, for the purposes of recruitment and propagandizing. Lastly, Defendant UNRWA provides Hamas with millions of dollars insofar as it knowingly facilitates Hamas's money laundering operation by strictly paying its Gaza employees in U.S. dollars (when it does not need to do so), thereby compelling its employees to use Hamas moneychangers.

272. Without Defendant UNRWA and its financier UNRWA USA, Hamas would be unable to finance its operations, recruit as many members, launch as many attacks, and hide its weapons and other equipment. Defendant UNRWA—and indirectly, Defendant UNRWA USA—are an integral part of Hamas's operating structure in Gaza, which includes carrying out the October 7 Terror Attacks.

273. U.S. Plaintiffs have been injured in their persons by reason of the acts of international terrorism committed, planned, or authorized by Hamas.

274. By aiding and abetting Hamas in committing, planning, or authorizing acts of international terrorism, including acts that caused each of the U.S. Plaintiffs to be injured in his or



her person and property, Defendant is liable pursuant to 18 U.S.C. § 2333(d) for, threefold any and all, damages that U.S. Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorney's fees.

275. Furthermore, incorporating by reference everything above, Defendants' provision of financial assistance to Hamas satisfies 18 U.S.C. § 2339B, which criminalizes the provision of material support to an FTO when the person "knows that the organization is a designated terrorist organization . . . , that the organization has engaged or engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989)." 18 U.S.C. § 2339B.

276. When prosecuting under 18 U.S.C. § 2339B, the U.S. Government must show beyond a reasonable doubt that a person provided material support to a terrorist organization. In contrast, 18 U.S.C. § 2333(d) requires only a showing by a preponderance of the evidence that Defendant provided substantial assistance to the terrorist organization that committed the acts that injured U.S. Plaintiffs.

277. Defendant undoubtedly is liable pursuant to 18 U.S.C. § 2333(d) for any and all damages that U.S. Plaintiffs have sustained as a result of such injuries.

**THIRD CLAIM FOR RELIEF**  
**VIOLATION OF THE ANTI-TERRORISM ACT, 18 U.S.C. § 2333(d)**  
**(Aiding-and-Abetting Liability, Conspiracy Predicate)**  
**UNRWA; UNRWA USA**

278. U.S. Plaintiffs repeat and reallege every allegation of the foregoing paragraphs as if fully set forth herein.

279. By knowingly conspiring, directly and indirectly, with Hamas and other October 7 FTOs to facilitate their operations and in furtherance of Hamas's committing, planning, or

authorizing acts of international terrorism, including acts that caused the U.S. Plaintiffs to be injured in his or her person and property, Defendants are liable pursuant to 18 U.S.C. § 2333(d) for, threefold any and all, damages that U.S. Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorney's fees, pursuant to 18 U.S.C. § 2333(a).

280. Upon information and belief, every donation from Defendant UNRWA USA to Defendant UNRWA involved a bank transfer with supporting documentation and receipts exchanged between the parties.

281. Each of these transactions was made with the explicit and implicit understanding and agreement that Defendant UNRWA USA's contributions were provided to Defendant UNRWA to advance the common objectives and agenda of Defendants and Hamas, including, but not limited to, the following: paying Hamas members; employing Hamas members; building schools that store Hamas weapons; producing and disseminating "educational" material to recruit young Gazans to Hamas; and facilitating Hamas's money laundering operation.

282. Defendant UNRWA met frequently with members of Hamas and other October 7 FTOs prior to and after October 7, 2023, boasting of their coordination and partnership with the terrorist organizations. For example, in several instances, this coordination explicitly concerned UNRWA employment vacancies, which if filled to Hamas's benefit, would directly benefit Hamas.

283. Indeed, Hamas benefitted and continues to benefit from its terrorists securing employment within the upper echelons of schools run by Defendant UNRWA. Not only do Hamas members use UNRWA schools to store and hide their weapons and equipment, UNRWA schools are the primary tool of propagandizing and recruitment for Hamas.

284. Thus, the October 7 Terror Attacks were a foreseeable consequence of Defendants' conspiracy to provide assistance to Hamas through the variety of mechanisms described herein.

**FOURTH CLAIM FOR RELIEF**  
**VIOLATION OF THE ALIEN TORT STATUTE 28 U.S.C. § 1350**  
**(Secondary Liability; Tort Committed in Violation of ‘law of nations’ or ‘a treaty of the**  
**United States.’)**  
**UNRWA; UNRWA USA**

285. Israeli Plaintiffs repeat and reallege every allegation of the foregoing paragraphs as if fully set forth herein.

286. Israeli Plaintiffs have suffered damages due to the horrific attacks by Hamas on October 7, 2023, and continue to suffer damages, for *Ms. Lavi’s husband is still being held hostage by Hamas.*

287. By financially contributing millions of dollars to Defendant UNRWA while being substantially aware of the UNRWA’s close ties to Hamas, Defendants UNRWA USA and UNRWA aided and abetted Hamas’s crimes against humanity, and this Court has jurisdiction to hear Israeli Plaintiffs claims under the Alien Tort Statute (“ATS”), 28 U.S.C. § 1350.

288. The ATS provides that “[t]he district courts shall have original jurisdiction of any civil action by an alien for a tort only, committed in violation of the law of nations or a treaty of the United States.” 28 U.S.C. § 1350.

289. “On its face, the statute specifies that, to state a claim, plaintiffs must (i) be ‘aliens,’ (ii) claiming damages for a ‘tort only,’ (iii) resulting from a violation ‘of the law of nations’ or of ‘a treaty of the United States.’” *Flores v. S. Peru Copper Corp.*, 414 F.3d 233, 242 (2d Cir. 2003).

290. Israeli Plaintiffs are Israeli citizens and thus constitute “aliens” under 28 U.S.C. § 1350.

291. UNRWA maintains a strong U.S. presence. Though based in Anman, Jordan, and in Gaza, UNRWA engages in a number of activities in the United States, as senior personnel from UNRWA frequently travel to solicit funds and receive approval for their budget operations here in

the United States. UNRWA also has New-York based staff that facilitate UNRWA's work in the Middle East. UNRWA also initially disburses its payroll through the bank J.P. Morgan Chase in New York.

292. To establish a claim under the ATS derived from a violation of “of the law of nations,” Plaintiffs must demonstrate that the alleged violation is “of a norm that is specific, universal, and obligatory” and that “allowing this case to proceed under the ATS is a proper exercise of judicial discretion.” *Jesner v. Arab Bank, PLC*, 584 U.S. 241 (2018).

293. Crimes against humanity are recognized as violations of the law of nations for the purposes of establishing a claim under the ATS. *Licci v. Lebanese Canadian Bank, SAL*, 834 F.3d 201, 213 (2d Cir. 2016).

294. Systematic attacks against a civilian population in order to expel them from the territory are recognized as crimes against humanity. *See id.* (“Plaintiffs have alleged systematic rocket attacks against the Jewish civilian population in Israel, committed with the intent to exterminate or expel them from the territory. These allegations adequately plead acts of genocide and crimes against humanity.”).

295. The “law of nations,” or international law, universally prohibits crimes against humanity such as those Hamas perpetrated on and after October 7, 2023, including kidnapping and imprisoning civilian hostages, attacking civilian populations, and holding human remains to use as bargaining chips.

296. As products of the post-World War II era, both the Rome Statute of the International Criminal Court (“Rome Statute”) and the Charter of the International Military Tribunal at Nuremburg after World War II (the “London Charter”) may inform the Court of what constitutes crimes against humanity. *See Almog v. Arab Bank, PLC*, 471 F. Supp. 2d 257, 275 (E.D.N.Y.

2007) (Rome Statute); *United States v. Yousef*, 327 F.3d 56, 83, 105 n.40 (2d Cir. 1995) (London Charter).

297. The Rome Statute is an international treaty adopted in 1998 and signed by 123 countries. *Inter alia*, it prohibits certain crimes against humanity that are committed against a civilian population in a systematic way, including murder, extermination, enslavement, deportation or forcible transfer of population, torture, rape, and persecution against an identifiable group.<sup>205</sup>

298. The London Charter, similar to the Rome Statute, defines crimes against humanity as “murder, extermination, enslavement, deportation, and other inhumane acts committed against a civilian population, before or during the war, or persecutions on political, racial or religious grounds ....”<sup>206</sup>

299. “Aiding and abetting is a theory of liability recognized by customary international law.” *Licci*, 834 F.3d at 213.

300. “[A] defendant may be held liable under international law for aiding and abetting the violation of that law by another when the defendant (1) provides practical assistance to the principal which has a substantial effect on the perpetration of the crime, and (2) does so with the purpose of facilitating the commission of that crime.” *Presbyterian Church of Sudan v. Talisman Energy, Inc.*, 582 F.3d 244, 259 (2d Cir. 2009) (internal quotation marks omitted).

301. Defendants provided and continue to provide practical assistance to Hamas that has substantially affected Hamas’s ability to carry out their crimes against humanity that have injured and continue to injure the Israeli Plaintiffs.

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<sup>205</sup> Rome Statute of the International Criminal Court art. 7 (July 17, 1998), <https://www.icc-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf>.

<sup>206</sup> Agreement for the Prosecution and Punishment of the Major War Criminals of the European Axis, and Charter of the International Military Tribunal, art. 6(c), Aug. 8, 1945, 82 U.N.T.S. 279.

302. Substantial portions of Defendants' aiding and abetting activity took place in the United States because both UNRWA USA and UNRWA fundraise in the United States and disburse their payments to UNRWA employees in Gaza through New York. As described prior, a significant amount of funds UNRWA raises originate in the United States. These are the very funds that UNRWA uses to knowingly aid and abet members of Hamas and other terrorist organizations when they commit unspeakable crimes against humanity, including the October 7 Terror Attacks.

303. More specifically, Defendant UNRWA USA funds Defendant UNRWA, which employs members of Hamas and other October 7 FTOs, as well as coordinates with their leadership directly. At least eighteen UNRWA employees partook in the October 7 Terror Attacks that harmed and continue to harm Israeli Plaintiffs.

304. Defendant UNRWA also provides these organizations, primarily Hamas and PIJ, with essential infrastructure from which to launch their attacks and store their weaponry, as well as with energy to power Hamas's command center. Defendant UNRWA also grants Hamas access to its schools, and specifically its pupils, for the purposes of recruitment and propagandizing. Lastly, Defendant UNRWA provides Hamas with millions of dollars insofar as it knowingly facilitates Hamas's money laundering operation by strictly paying its Gaza employees in U.S. dollars (when it does not need to do so), thereby compelling its employees to use Hamas moneychangers. Without Defendant UNRWA and its financier UNRWA USA, Hamas would be unable to finance its operations, recruit as many members, launch as many attacks, and hide its weapons and other equipment. Defendant UNRWA—and indirectly, UNRWA USA—are an integral part of Hamas's operating structure in Gaza, which includes carrying out the October 7 Terror Attacks.

305. Defendants have provided this practical assistance with the purpose of facilitating Hamas's crimes against humanity.

306. UNRWA USA knew of UNRWA's employment of Hamas members and of UNRWA's close relationship to Hamas, an organization whose founding charter calls for the killing of the Jewish people. And despite this knowledge, UNRWA USA continued to contribute to UNRWA. UNRWA USA, in addition to UNRWA, is therefore liable to Israeli Plaintiffs for the injuries they suffered due to Hamas's attacks on October 7, 2023, and continue to suffer.

307. Defendants' tortious actions have resulted in damages to Israeli Plaintiffs, including pain and suffering, emotional distress, loss of consortium, lost wages, medical expenses, and property damage.

### **JURY DEMAND**

308. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury on all claims so triable.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray that this Court:

(a) Enter judgment against Defendant and in favor of each Plaintiff for compensatory damages in amounts to be determined at trial;

(b) Enter judgment against the Defendant and in favor of each Plaintiff for treble damages pursuant to 18 U.S.C. § 2333(d)(2);

(c) Enter judgment against the Defendant and in favor of each Plaintiff for any and all costs sustained in connection with the prosecution of this action, including attorneys' fees, pursuant to 18 U.S.C. § 2333(a);

(d) Enter judgment against the Defendant and in favor of each Plaintiff for any and all relief as appropriate, including damages and attorney fees, under 28 U.S.C. § 1350;

(e) Award Plaintiffs punitive damages in an amount sufficient to punish the Defendant

and to deter similar conduct in the future; and

(f) Grant such other and further relief as justice requires.

Dated: August 22, 2025

Respectfully submitted,

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